



Welcome to Our Report

We are pleased to share the Kroger Family of Companies' latest progress on sustainability and community engagement for the 2024 reporting period with our stakeholders.

Kroger's *Thriving Together* strategy reflects how our company supports and serves our associates and customers every day, lifting up our neighbors and creating stronger communities.

Our Responsible Business strategy includes a wide range of topics affecting people and our planet. Informed by a double materiality assessment and ongoing engagement with leaders inside and outside our company, these insights help shape our approach and progress as outlined in this report.

Our *Thriving Together* strategy continues to evolve over time to complement and integrate with Kroger's core business and go-to-market strategy. We believe a strong, thriving company means stronger, thriving communities wherever we operate.

Strategic Oversight

The Board of Directors oversees Kroger's management approach to our Responsible Business strategy and key sustainability and social responsibility topics. A dedicated Public Responsibilities Committee of the Board-established in 1977—engages leaders and reviews progress on the company's sustainability and social responsibility goals, including our Zero Hunger | Zero Waste plan.

Kroger's leadership team is accountable for implementing our Responsible Business strategy and driving performance to achieve goals. Sustainability and community engagement priorities are developed and managed by a centralized team, led by our group vice president of Communications & Public Affairs, who serves as chief sustainability officer, in collaboration with an internal network of business leaders and subject matter experts across many disciplines.

Report Scope

This report covers Kroger's 2024 fiscal year from February 4, 2024, to February 1, 2025. Unless otherwise noted, data included in the report reflects this period. The report incorporates most of our operations, except for certain datasets related to integrating banners from mergers into our tracking systems. Where appropriate, we note the scope of specific performance tracking in the relevant report section.

Reporting Approach

The content in this report reflects leading reporting practices with modifications, as previously noted and in the pages that follow. Our approach to defining content reflects insights from our most recent double materiality assessment.

We continue to monitor developments in reporting standards and best practices. We provide a Sustainability Accounting Standards Board (SASB) Index at the end of this report to provide additional disclosures in alignment with the SASB Food Retailers & Distributors Standard.

We comply with applicable federal and state laws regarding relevant disclosures. We continue to align with the Task Force on Climate-related Financial Disclosures (TCFD) and monitor developments in other emerging frameworks.



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About Kroger

Since Kroger's earliest days, we have prioritized offering convenience and value to our customers. We remain focused on our purpose-driven plan to increase access to quality, affordable fresh food for everyone.



Our Values

In fulfilling Our Purpose—To Feed the Human Spirit™—we live by Kroger's long-standing Values:



Honesty

We insist on truthfulness with each other, with our customers, with our vendors and in our business records. We expect and value openness.



Inclusion

We encourage and expect collaboration, teamwork and the active involvement of all associates.



Integrity

We act in accordance with Our Values, even when it's difficult.



Diversity

We seek and embrace differences in the backgrounds, cultures and ethnicities of all associates, customers and vendors.



Safety

We protect our customers and each other from injury with a safe and secure workplace and shopping environment.



Respect

We treat all with dignity and value the opinions and perspectives of others.



Our Business





\$147.1B

total 2024 sales



63M

households served annually



2,731

grocery and multi-department stores in 35 states and the District of Columbia



8

Kroger Delivery fulfillment centers



43

distribution centers



409K

associates company-wide



33

Kroger-owned food production plants

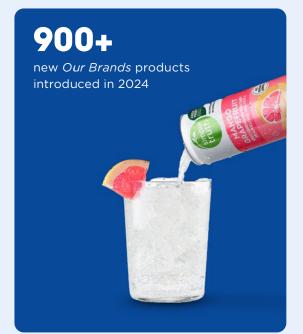


2,273

pharmacies

Key Highlights

Kroger makes grocery shopping easy, convenient and affordable for our customers every day. Dedicated associates across the country live Our Purpose and Zero Hunger | Zero Waste mission, giving back meaningfully to make a difference in our communities.





















Our Value Chain

Kroger serves our communities with a combination of local neighborhood grocery stores and online grocery solutions to meet our customers' needs. Working with our vendors, suppliers and others. we aim to responsibly buy, make, move and sell

a wide range of food and other essentials for individuals and families on any budget. We focus on offering affordable products that meet our customers' wideranging tastes and preferences for quality food and household items.



Sourcing









Our Supply Chain

We procure raw materials and ingredients for food production that meet food safety, quality and sustainability specifications; fresh items from farmers, fishers and other producers; and finished goods from manufacturers in our global supply chain.

Kroger also manages indirect sourcing for the services, technology and supplies needed to run our business. We use a centralized team and Supplier Hub to manage supplier engagement and compliance with established policies.

vendors and suppliers work with us

Manufacturing

We manufacture 31% of total *Our Brands* units sold at 33 Kroger-owned food production plants across the country. The remaining *Our Brands* items are produced to our strict specifications by outside manufacturers.

Our food production plants include 14 dairies, nine deli or bakery plants, five grocery product plants, two beverage plants, one meat plant and two cheese plants.

We have five \$1 billion+ brands in our portfolio: Kroger®, Private Selection®, Simple Truth®, Home Chef® and Bakery Fresh.

of total Our Brands units sold are

manufactured by Kroger

Distribution

Our Operations

A Kroger-operated fleet and third-party operators move our products from food production plants to warehouses for transport to our stores, or to dedicated fulfillment centers for delivery to our customers' homes. Consumer packaged goods companies also deliver *Our Brands* products and national brand products to warehouses or directly to our stores.

Our Brands products play an important role in our merchandising strategy and represented over \$32 billion in sales in 2024. Our supermarkets, on average, stock over 12.000 private-label items.

private-label items in the Our Brands portfolio

Retail

Customers shop with us at neighborhood stores and online through our digital platform that fulfills orders through curbside pickup and direct-to-home delivery through fulfillment centers and Instacart services.

In-store pharmacies and health clinics offer convenient access to medications, health services and dietitian support. We also operate 1,665 fuel centers and an expanding network of electric vehicle (EV) charging stations.

Our Customers

Households

Providing affordable, high-quality fresh food for more than 63 million households annually is Kroger's highest priority. Our insights team at 84.51° combines customer transaction information and publicly available data to provide custom offers that drive higher-than-average redemption, loyalty and trust among shoppers.

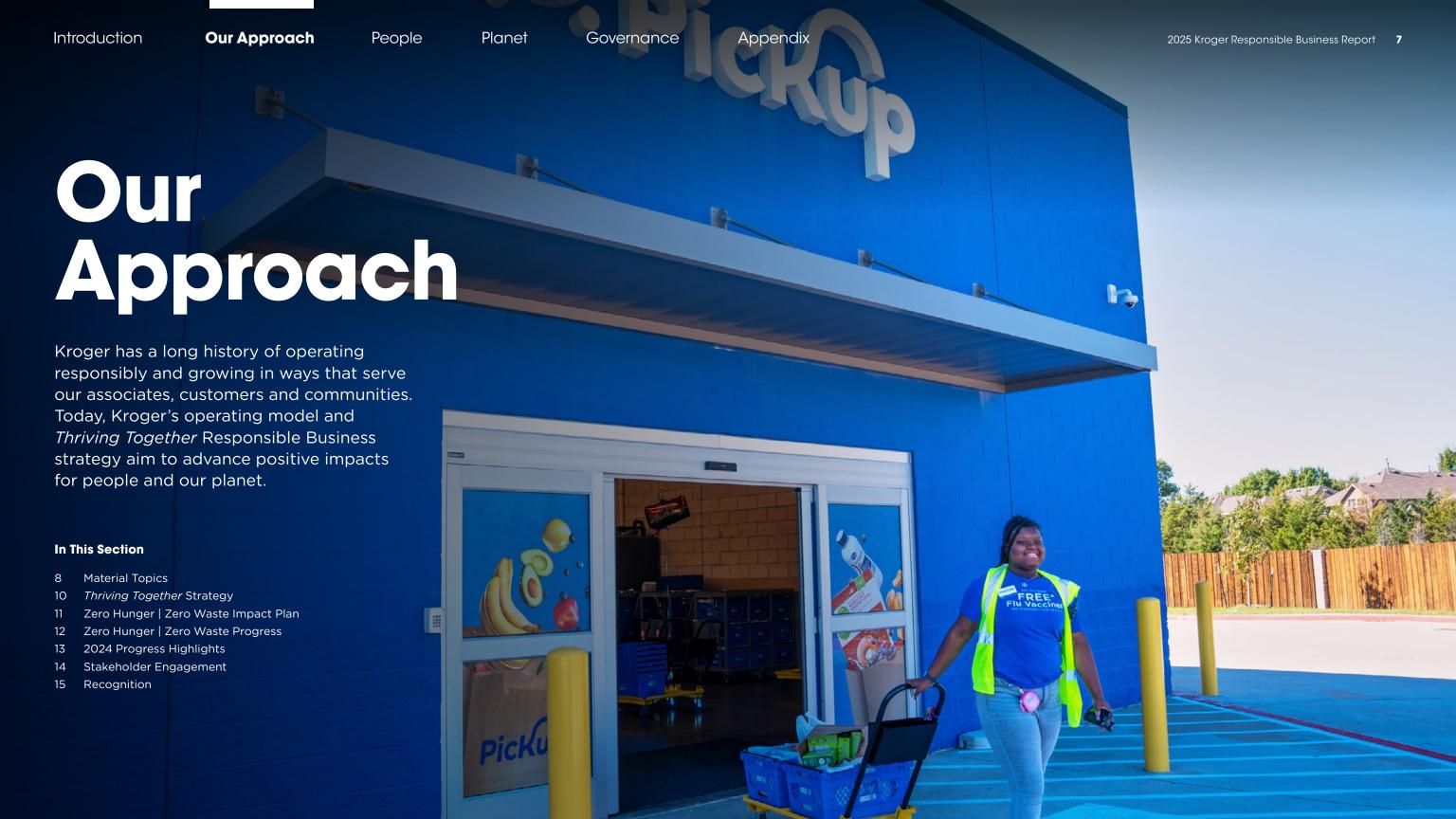
We aim to provide easy ways for our customers to live healthier and more sustainable lifestyles. We seek customer feedback through in-store service counters, surveys, focus groups, websites and social media, as well as Kroger Customer Connect, our live call center.

35 states + District of Columbia

with Kroger-operated retail stores

S600

in weekly savings and digital offers for our customers



Kroger's Responsible Business strategy is informed by a comprehensive risk assessment completed in alignment with principles of double materiality. Valuable insights from this process and ongoing engagement with our internal and external stakeholders shape our future ambitions and public disclosures.



Double Materiality Assessment

Double materiality, the leading methodology for assessments, evaluates topics relevant to companies and is increasingly included in reporting guidelines and frameworks. This approach contemplates two different lenses through which material sustainability and social topics can be viewed and disclosed, including:

- Outward impact: The potential impact of a company's activities on people, the environment and the economy. For example, managing GHG emissions has an impact on our planet.
- Inward impact: Topics or matters that may affect a company's ability to operate and deliver business value in the future. For example, changing weather patterns and temperatures may pose potential risks to the company's business operations over time.

Kroger's most recent formal materiality assessment —completed in 2023—aligned with the principles of double materiality.

Determining Material Topics

We determined relevant topics by reviewing the priorities of key stakeholders through ongoing dialogue, sustainability reports, sustainability ratings and rankings, reporting frameworks, industry reports, consumer surveys and media scans. The result was a list of 26 topics identified for further assessment. We identified boundaries for each topic based on stakeholder expectations and our management practices.

To prioritize these topics and apply the Stakeholder Inclusiveness Principle outlined in the GRI Standards, consultant Environmental Resources Management (ERM) conducted in-depth interviews with 32 internal and external stakeholders. We invited approximately 60 additional subject matter experts and stakeholders to complete a quantitative online survey. Based on these insights, we prioritized eight topics as most "material," or foundational to our business or presenting higher levels of risk or opportunity.

High-priority topics were discussed and validated through a series of meetings with internal leaders and the Public Responsibilities Committee of the Board. The validated topics shaped the content of this report, detailing our management approach, goals and performance. Topic placement on the matrix and changes over time also may inform the company's management approach.

Double Materiality Assessment Process

Discovery

Source review, trends analysis, defined topic list

Assess inward impact

Internal & external stakeholder engagement

Assess outward impact

Value chain mapping, external stakeholder engagement

Topic prioritization

Topic ranking, summary report

Validation

Leadership engagement & review, validation workshop

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About the Results

The output of the double materiality assessment can be characterized in a few main takeaways. Highest-priority topics—in the Tier 1 segment in the matrix at right—extend across all three pillars of Kroger's *Thriving Together* strategy:

- Topics affecting people: Food & product access & affordability; health & nutrition; and talent attraction, engagement & retention
- Topics affecting our planet: Energy & GHG emissions, operational waste and food waste
- Governance topics: Food safety, data privacy & cybersecurity, and responsible supply chain & sourcing

These findings generally align with the company's strategic focus areas while providing additional validation and insights.

Many topics are complex and interconnected with potential impacts to both people and our planet. Some require a more integrated and crossfunctional management approach that balances insights and feedback from many stakeholders with different perspectives.

Topic Placement

The matrix represents the two types of impact associated with each topic. Topics are positioned on the matrix according to their relative degree of impact, which reflects both internal and external perspectives. A high rating on the X axis (inward impact) means a topic may pose a higher degree of risk or opportunity to Kroger and its ability to create value over time. A high rating on the Y axis (outward impact) means that Kroger's business activities related to a topic may have a higher degree of impact on people and our planet.

Topics at the top right of the matrix have the highest degree of both types of impact and are strategically important. All topics on the matrix are important; however, these insights from both internal and external stakeholders inform and shape Kroger's management approach, topic prioritization, potential investment of resources and public reporting.

Please see the <u>Material Topics Summary table</u> in the Appendix for definitions and a link to the primary narrative discussion for each.



Material Responsible Business Topics



Inward impact: Impact of topics on Kroger Increasing importance to internal stakeholders



We imagine a future where everyone is thriving together. We build stronger communities by growing our business, operating responsibly and advancing sustainability as we grow.

We manage a broad portfolio of material topics as part of our Responsible Business strategy, which focuses on advancing positive changes for people and our planet.

Kroger's purpose-driven Zero Hunger | Zero Waste impact plan sits at the center of our strategy and expresses our mission to end hunger and waste in our communities. We believe everyone should have access to affordable, healthy and sustainably produced food.

We outline our primary focus areas for Zero Hunger | Zero Waste here, and we share our latest progress achieved during 2024 on the following pages. **Our Purpose**To Feed the Human Spirit

Our Brand PromiseFresh for EveryoneTM

Responsible Business Strategy
Thriving Together



Our Associates

We value our associates because they are the foundation of our success. We create a brighter future for our associates by investing in wages, industry-leading benefits and opportunities to learn, grow and succeed.

READ MORE ON PAGE 18

Our Customers

We make it easy for our customers to shop for fresh, quality, affordable food and other essentials. Investing in lower grocery prices, weekly promotions, personalized offers and rewards is a key part of Kroger's business model.

READ MORE ON PAGE 24

Our Communities

We strengthen our communities by offering access to employment and convenient ways to shop, and by giving back generously through Kroger's Zero Hunger | Zero Waste impact plan to end hunger and waste.

READ MORE ON PAGE 28

Climate Impact

We manage energy use and reduce GHG emissions in our own operations, and we collaborate with others to create a cleaner energy future and a healthier planet.

READ MORE ON PAGE 34

Waste & Circularity

Kroger aims to minimize waste in our operations and achieve our zero waste ambition. We also focus on improving *Our Brands* packaging and encourage our customers to try more sustainable product options.

READ MORE ON PAGE 38

Biodiversity & Resource Conservation

We promote responsible land use and more sustainable production methods to protect pollinators, natural habitats, and life on land and in water.

READ MORE ON PAGE 43

Kroger's Zero Hunger | Zero Waste impact plan sits at the center of our *Thriving Together* strategy. It's our mission to end hunger and waste in our communities and make sure more fresh, nutritious food achieves its highest purpose: feeding people.

Our Zero Hunger | Zero Waste plan, introduced in 2017, addresses a fundamental absurdity in our food system: Collectively, we produce more than enough food to feed everyone today, yet 1 in 7 Americans still struggle with hunger. We focus on advancing change through our core business and operating model, strategic charitable giving, and coalitions of action with our communities to improve food and nutrition security, now and in the future.





Affordable Fresh Food

Nourishing Our Communities

- Offer low grocery prices and feature promotions on fresh, healthy food every day
- Increase food access through our eCommerce platform, available to virtually all customers, and make paying with food assistance benefits easy
- Offer affordable Boost by Kroger Plus membership options for more savings on groceries, grocery delivery fees and fuel
- Promote fresh, healthy items and offer nutritional scoring to improve health and well-being

Food Rescue & Donations

- Use promotions and markdowns as food nears use-by dates to make it even more affordable and promote faster sale
- Safely rescue remaining surplus fresh food for made-in-store items or for donation to local food agencies to improve food security in our communities

Advocacy

 Support efforts to preserve and increase access to food and food assistance in our communities



Resource Conservation

Climate Impact

- Reduce energy use, GHG emissions and waste in our operations for a cleaner, healthier planet
- Recover and divert unsold organics and food not eligible for donation to keep it out of landfills
- Collaborate with others to reduce emissions from agricultural production and our supply chain

Operational Waste & Food Waste

- Improve how our facilities manage waste and recover more recyclables to keep more waste out of landfills
- Expand store and facility programs to recycle food scraps through animal feed, composting and anaerobic digestion
- Scale food de-packaging solutions to make it easier for associates to recycle packaged foods

Product Sustainability

- Work with suppliers to adopt more sustainable agricultural production methods that conserve resources and protect habitats and biodiversity
- Support collaboration to improve sustainability among food producers, brands and retailers



Nourishing Meals

Stronger Communities

- Donate fresh food and charitable funds to help feed and nourish people in our communities
- Strategically direct charitable donations to support Zero Hunger | Zero Waste in ways that improve food security
- Support organizations and innovators helping increase access to affordable fresh food
- Invite customers to round up their purchase to the nearest dollar to benefit The Kroger Co.
 Zero Hunger | Zero Waste Foundation to help feed neighbors in need

New Solutions

- Support innovation and pilots to test new ways to improve food security and health through the Zero Hunger | Zero Waste Foundation's Innovation Fund
- Fund capacity-building initiatives in our local communities to rescue more food and provide more meals
- Convene and join industry and other coalitions of action focused on ending hunger and waste

Zero Hunger | Zero Waste Progress

We are grateful to countless community leaders, nonprofit organizations and innovators working with Kroger to achieve our mission. Together, we imagine a future without hunger and waste.

Our Zero Hunger | Zero Waste impact plan is designed to advance positive changes wherever we operate. The persistent problems surrounding hunger and waste are complex and interconnected—at global, national and local levels. We continue to focus on improving our own operations and working with others in our value chain to drive greater positive impacts in our local communities and beyond.

With more than 140 years of experience in the food business, Kroger is uniquely positioned to help solve this big problem. We focus on:

- Making it easy for more people to shop for fresh, affordable food
- Donating surplus fresh food to feed our neighbors
- · Reducing the amount of operational waste and retail food waste sent to landfills
- · Reducing emissions for a healthier planet
- Offering more sustainable Our Brands packaging
- Giving our customers easy ways to support our mission and live healthier lifestyles

Key Highlights

Every day, Kroger associates live Our Purpose by rescuing surplus food in our stores that can no longer be sold and donating it to local hunger relief organizations. Last year, our associates rescued and donated 119 million pounds of food companywide. Thanks to these efforts and charitable cash donations to hunger relief, we have donated nearly 4 billion meals to our communities since 2017.

Reducing wasted food in our communities is a big part of our Zero Hunger | Zero Waste plan. Surplus food that cannot be safely donated to feed people goes to food waste recycling programs like animal feed, composting or anaerobic digestion. Since 2017, we have improved food waste diversion from landfills to 58%.

Reducing waste also means managing energy use. minimizing GHG emissions and improving Our Brands packaging to be more recyclable, reusable and compostable.

For more about our Zero Hunger | Zero Waste impact plan, please see our website.

2024 Highlights



Progress Since 2017

3.9B meals donated to our communities



\$276M

in charitable giving to hunger relief organizations in our communities (food and funds)



Kroqer **FOUNDATION** \$1.8B in charitable giving to end hunger

119M

pounds of surplus fresh food donated



operational waste diversion from landfill company-wide



97%

of stores participating in food waste recycling programs

58% retail food waste diversion from landfills





2024 Progress Highlights

We recognize the unique role Kroger plays in the future of food. We aim to operate responsibly, live Our Purpose and fulfill our Zero Hunger | Zero Waste impact plan to advance positive changes for people and our planet. Additional details about these and other goals and metrics are shared in the People, Planet and Governance sections of this report.



People

Goals & Metrics	2024	Status
Social Responsibility		
Food Access & Affordability		
Introduce new quality affordable <i>Our Brands</i> products	900+	
Annual meals donated to our communities—food and charitable donations	518M	
Donate 3 billion meals to communities by 2025 (2017 baseline)—food and donations	3.9B meals	©
Food Rescue Donations		
Donate surplus fresh food from stores and facilities to our communities through Kroger's Zero Hunger Zero Waste Food Rescue program	119M pounds	
100% of retail stores actively donating surplus fresh food by 2025	100%	©
Charitable Giving		
Total annual charitable giving to our communities	\$346M	
Share of total charitable giving donated to national and local organizations helping end hunger	\$276M	

Planet

Goals & Metrics	2024	Status
Environmental Impact		
Climate Impact		
Achieve a 30% cumulative reduction in Scope 1 & 2 GHG emissions from 2018 baseline	-14.9%	
Waste & Circularity		
Achieve 90%+ waste diversion from landfill company-wide	85%	\otimes
Reduce total food waste generated in retail stores by 50% cumulatively (2017 baseline)	4%	\wp
Achieve 95% diversion of remaining retail food waste from landfill	58%	\bigcirc
95%+ of retail stores participating in food waste recycling programs	97%	O
Seek to achieve 100% recyclable, compostable and/or reusable <i>Our Brands</i> packaging	52%	
Increase recycled content in packaging so <i>Our Brands</i> portfolio collectively contains 10%+	10%	⊘
Biodiversity & Resource Conservation		
Percentage of Seafood department products aligned with Kroger's Seafood Sustainability Policy	97%+	
Percentage of palm oil, beef, soy and paper volumes sourced for manufacturing plants and meat counter meeting no- or low-deforestation risk definitions	94%+	















Stakeholder Engagement

Kroger has a large and diverse group of stakeholders, including individuals and groups who may be affected by our operations. These communities influence how we run our business and help guide how we develop our sustainability and social impact strategies.

We proactively manage relationships to foster open dialogue and capture feedback from more than 70 organizations on over 30 topics related to responsibility and sustainability. While our approach to engagement varies by group, we prioritize topics based on our strengths, *Thriving Together* strategy, materiality assessment results and other risk-based analyses.

Key Stakeholders	Primary Engagement Methods	Engagement Outcomes 2024
Shareholders	Kroger's leaders, our Investor Relations team and other subject matter experts engage with shareholders throughout the year. Key channels include direct investor engagement, investor conferences, our annual shareholders' meeting, quarterly earnings calls, financial reports, investor questionnaires about Responsible Business topics, www.thekrogerco.com , press releases and webcasts.	In 2024, under the direction of the Board, we requested engagement meetings with 33 shareholders representing 61% of our outstanding shares and subsequently met with 21 shareholders representing 24% of our outstanding shares (we met with many of those shareholders more than once). Some investors we contacted either did not respond or confirmed that a discussion was not needed at that time.
Non-Governmental Organizations (NGOs)	We engage many NGOs to share how Kroger approaches topics affecting people and our planet, including our Zero Hunger Zero Waste impact plan. We welcome constructive and open dialogue with NGOs on a wide range of topics.	Open and candid dialogue with NGOs helps shape how we manage the wide range of topics in our Responsible Business strategy. In 2024, feedback included topics related to agricultural food production and mitigating potential environmental risks to natural resources, wildlife habitats and biodiversity. These insights and others informed our approach to conducting both a climate scenario risk analysis and biodiversity risk assessment for our own operations and supply chain during 2025.
Associates & Labor Unions	We engage with Kroger associates in all locations where we operate. We use training, one-on-one discussions and coaching, our intranet, email, leadership meetings and town halls, affinity and inclusion groups, internal and external social media, and associate engagement surveys. We also communicate with local and international unions through scheduled meetings, telephone calls and ongoing collective bargaining agreement negotiations.	Our associates' feedback through surveys and in-person dialogue informs decisions about programs and tools that improve their work experience. Last year, leaders developed and implemented action plans to address key insights, including requests for easier scheduling and information access. As a result, we introduced Sage, a new Al-powered virtual assistant that provides faster and easier access to HR-related information, including work schedules, pay stubs and requests for paid time off.
Customers	We offer customers many ways to engage with us, including in-store service counters, surveys, focus groups, websites and social media, as well as Kroger Customer Connect—our live call center.	Regular feedback from our customers and purchasing information informs decisions about product assortment at our neighborhood stores across the country. We aim to serve the unique needs of shoppers in the communities where we operate, including local and regional favorites, new <i>Our Brands</i> and national brand items, and items our customers request, where possible.
Communities	We foster close relationships with the neighborhoods in which we operate and listen to local and national organizations needing support to achieve mutual goals. Key channels include direct engagement, local giving and fundraising, service and volunteerism, weekly food donations, hunger relief, ongoing special events, store openings, media relations and more.	We stay connected with national and local nonprofit organizations in our communities in good and challenging times. In 2024, input from relief agencies and others shaped our response to natural disasters affecting our neighbors. As a result, Kroger donated more than \$2.3 million in food and funds to aid in disaster relief and recovery efforts in California, Florida, Georgia, North Carolina, Tennessee, Texas and other communities.
Suppliers & Manufacturers	Kroger's engagement with our suppliers is a critical element of our commitment to responsible sourcing and supply chain accountability. We focus our engagement during the onboarding process and continue it through ongoing meetings, site visits, surveys and audits.	In 2024, we engaged our fresh produce vendors and growers to advance positive changes for people and our planet. This includes both encouraging growers to participate in the Ethical Charter Implementation Plan and enhance their management systems for respecting the rights of farmworkers and communicating our Nature-Based Goal to Protect Pollinators and Biodiversity to our suppliers.

Recognition















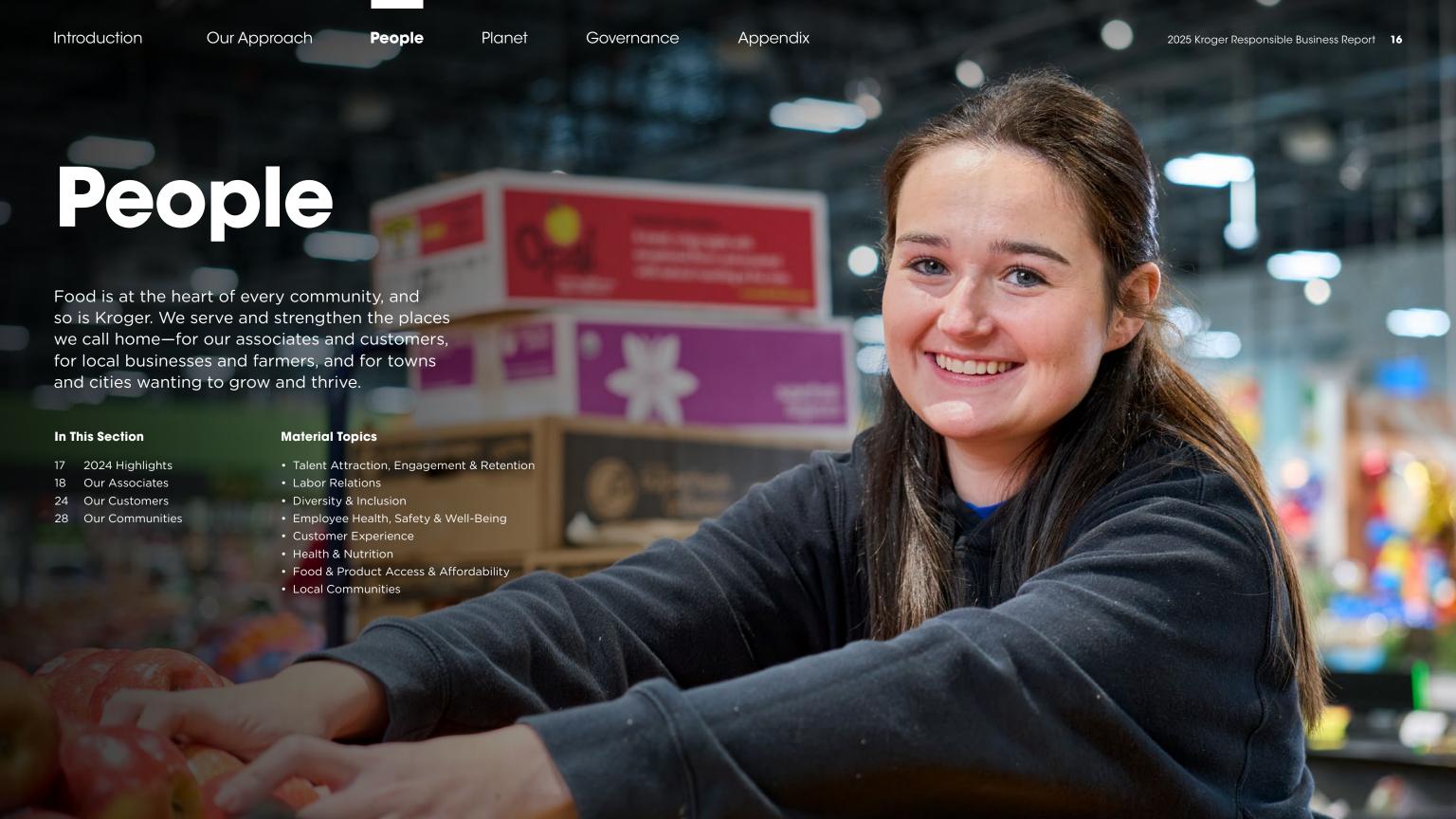












People: 2024 Highlights

At Kroger, Our Purpose is to Feed the Human Spirit. Our ambition extends far beyond the food and essentials we provide. We create brighter days and uplifting experiences for our associates, customers and communities, and we are a generous and trusted partner in the neighborhoods we serve and beyond.





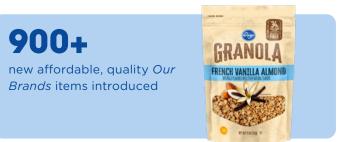








ZERO HUNGER | ZERO WASTE
UPLIFTING OUR COMMUNITIES
KROGER HEALTH







Our Associates

Kroger offers jobs, skill-building and career opportunities for thousands of people in our communities every year. Many associates join for a part-time job and discover a fulfilling career at Kroger. We strive to hire people who reflect the communities we serve and create a respectful and welcoming work environment where everyone can thrive.

Our Approach

Kroger's success and growth are possible because of our dedicated associates who choose to build their careers with us. They are the heartbeat of our stores, our distribution and fulfillment centers, our manufacturing plants and our offices. They are what make Kroger such a special place. Every day, our associates deliver fresh and friendly experiences for our customers, serve our communities and live Our Purpose. We continue to invest in ways that help them grow and learn with Kroger.

Kroger's chief associate experience officer leads efforts to support, inform and advocate for our associates by overseeing the company's Associate Experience, Labor Relations, and Communications and Public Affairs teams. Guided by Our Purpose and Values, these teams—along with people champions across the business—focus on advancing our human capital management strategy to support individual and company success. We monitor and measure progress on key metrics and identify opportunities to increase associate engagement, well-being and belonging.

The Compensation and Talent Development Committee of the Board oversees progress on topics related to our associates' experience.

Because of our unique business model, we help unlock economic opportunity for nearly half a million people of various ages and aspirations—from those seeking entry-level part-time jobs to graduate-degree specialists across corporate functions. In 2024, a total of 409,000 associates were part of the Kroger family of companies.

Our People Strategy

We value and respect our associates, and we want to connect meaningfully with them throughout their employment journey, providing important opportunities to learn, grow and advance.

Kroger's people strategy focuses on four priorities:

- Attract, develop and retain best-fit talent
- Develop effective leaders
- Advocate for our associates' well-being
- Create a high-performing culture

This strategy is designed to improve associate engagement, reduce turnover and develop a strong workforce. It requires a holistic approach, focusing on every stage of our associates' journey from candidate to alumni, including the care they need to grow and the skill-building resources they need to deliver on our business strategies.

This journey begins with a consistent and effective onboarding experience and continues through ongoing connections to support performance and yearly training and development focused on skills and capabilities for success.

Investing in Our Associates

Kroger continues to invest in our associates through wages, benefits, training, safety, well-being and more—because we know that when they have a better experience, our customers have a better experience too.

A key component of these efforts is continually refining our competitive Total Rewards programs, which include compensation, healthcare benefits, retirement benefits and perks available to our associates, including those covered by collective bargaining agreements. We offer competitive pay and benefits in our stores, distribution centers, dedicated fulfillment centers, manufacturing plants, technology hubs and administrative offices.

Material Topics

TALENT ATTRACTION, ENGAGEMENT & RETENTION LABOR RELATIONS **DIVERSITY & INCLUSION EMPLOYEE HEALTH, SAFETY & WELL-BEING**

64% of our associates are covered by collective bargaining agreements negotiated with local unions

Nearly \$25.35/hour

average retail hourly wage including comprehensive benefits; nearly \$19.50/hour without benefits



S64M

in Continuing Education Program tuition reimbursements to associates since 2018

We offer high-quality healthcare coverage for our associates and their families. We listen to our associates and invest in healthcare benefits that they consider to be most meaningful, including comprehensive and affordable healthcare coverage with support for family members and domestic partners.

In 2024, we introduced Sage, a new Al-powered virtual assistant for our associates. Sage provides real-time access to scheduling information for Kroger leaders and associates so they can easily access work schedules, see pay stubs, request time off, review training information and more. Today, more than 68,000 associates actively use Sage to manage some associate experience-related interactions and questions.

In early 2025, Kroger integrated our *Fresh Start* training application and Sage Virtual Assistant to make it even easier for associates to access training and for leaders to manage new hires' onboarding and training.

More information about how Kroger <u>supports our</u> associates' well-being.

Hiring & Engaging Associates

We offer every associate opportunities to develop skills and discover a rewarding career at Kroger. We provide accessible and flexible employment options for people of all ages and backgrounds, including candidates looking for a part-time job or building a fulfilling professional career.

The Kroger Family of Companies aims to be an employer of choice in our communities and across the country, and we continue to adapt and improve how we attract and tap into sources of talent. This includes enhancing our recruiting systems and early talent pipeline. We know that for many associates, Kroger is their first job.

In 2024, we added a recruiting module to our new MyInfo HR technology platform to enhance our talent attraction systems. With this added functionality, Kroger's hiring and management teams have a new suite of tools to enhance the candidate experience and improve our time-to-hire and time-to-start metrics.

Gen Z accounts for a growing share of today's workforce and tomorrow's leaders, and Kroger continues to invest in our internship program and early talent pipeline. In 2024, we welcomed more than 450 students who worked as interns and received on-the-job learning opportunities. Kroger interns work on real projects and produce real results across all areas of the business, from store and supply chain operations to corporate functions. We continue to increase the number of interns in our program and extend it to all lines of business.

Reflecting Our Communities

We hire and welcome new associates of all backgrounds in the neighborhoods we serve. This includes candidates like mature adults, military service veterans and those seeking employment reentry. We work with many other groups to recruit new talent, including veterans' organizations and multicultural universities and colleges.

We offer jobs that support the unique needs of our military veterans, service members transitioning from active duty and their families. In 2024, our Associate Experience team hosted hiring events so veterans and their families could learn more about career opportunities at Kroger. Candidates participated in one-on-one conversations about their interests to help match them to a wide range of career paths and opportunities.

Kroger also further expanded our collaboration with justice-impacted organizations through our New Beginnings program, which includes all food processing plants, warehouses and fulfillment centers. Powered by collaboration with more than 75 trusted community partners, we help create second-chance opportunities for certain individuals to start fresh and become financially stable through employment and access to benefits, depending on the role. In 2024, we welcomed more than 270 new associates to Day 1 orientation through New Beginnings.

Engaging Our People

Listening plays a critical role in our ability to retain and develop our associates. We gather feedback throughout the year in a variety of forms, including a company-wide Associate Insights Survey. Overall associate engagement has improved in recent years. The engagement score from our most recent full survey in 2023 was 57, an increase from the prior two years. Our next full survey is in 2025.

Our survey results tell us that key drivers of engagement include: a sense of belonging, confidence in the future of the company, positive changes being made to address survey feedback, the company's genuine interest in our associates' well-being and having a friendly and caring place to work.

While overall engagement has improved, we continue to listen and respond to our associates' input. After reviewing company-wide and team results, leaders develop and implement site- and team-based action plans to address feedback on key themes, including associate belonging, overall well-being and supervisor effectiveness. In 2024, we conducted pulse surveys instead of a full engagement survey to give leaders more time to develop and implement action plans to address our associates' input.

We may conduct other pulse surveys throughout the year to check our progress, measure well-being and see how our associates are feeling. Based on these insights, we can offer additional resources for leaders and associates to respond to feedback more quickly.

Associate Resource Groups

To support our associates and foster inclusion, Kroger offers 15 Associate Resource Groups (ARGs), or affinity groups, with chapters across the country. These groups enable personal connections across the Kroger Family of Companies, facilitate shared experiences, encourage cross-ARG membership for awareness, and promote personal and professional growth.

Kroger leaders sponsor the ARGs and personally engage with members, allies and other associates who are interested in learning more. All associates are welcome to join any of the ARGs to listen, learn and meet other associates.

An ARG Steering Committee of diverse leaders helps review and establish consistent principles to advance associate engagement, professional development and community outreach, and to foster a sense of belonging.

Improving Retention

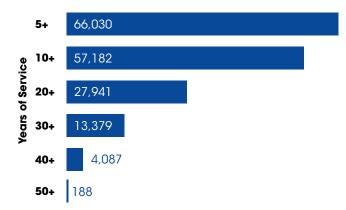
Many associates come to Kroger for a first or parttime job and discover a rewarding career. These first jobs form a strong foundation of real-world job skills and experience that serves our associates in any next job in store operations or across the business in Supply Chain, Technology, Finance or other corporate functions.

Associates tell us they value our Total Rewards programs, which include competitive wages, quality healthcare, retirement benefits, well-being resources and more. We believe investing in these programs enables associates to grow and thrive and improves retention over time.

We aim to improve associate experiences at every stage of their time with us, from the hiring and pre-boarding process to onboarding, training, performance management and feedback experiences. We continue to enhance internal metrics to align teams at all levels, track our progress and improve common measures that affect retention, including time to hire, time to start, the onboarding experience and participation in user-friendly training modules.

Come for a Job. Discover a Career

Associates celebrating milestones in 2024



Developing Associates & Leaders

We aim to cultivate a culture of opportunity where everyone can thrive. This includes providing tools and resources to help our associates learn new skills, expand capabilities and grow their careers.

Kroger offers a range of comprehensive training and development opportunities for all associates, from entry-level new hires to corporate and executive leaders. We support the learning, growth and development of our associates to build skills that serve them well at Kroger or elsewhere. In 2024, we invested \$189 million in training for our associates company-wide.

We continue to accelerate the use of our digital learning app *Fresh Start* for a better onboarding and learning experience. Fresh Start—available on shared company-owned technology or associates' personal mobile devices—provides quick and effective training to frontline associates in an engaging format, helping them develop important skills, build confidence and more effectively serve our customers. This new platform makes new-hire onboarding easier and enables us to deliver training in the flow of associates' everyday work.

With Fresh Start and more traditional training modalities, we deliver a wide range of information to associates at all levels, including role-based training, leadership development opportunities, and courses on Our Purpose and Values, associate well-being and safety, service excellence, our Zero Hunger | Zero Waste impact plan and more.

In 2024, we introduced several enhancements to the Fresh Start app, including new skills-based onboarding paths and digital guizzes to assess our new hires' proficiency levels. We also launched new communication functionality to more easily share local division and facility news, tasks, recognition and other content.

Continuing Education

To help associates achieve their learning goals, we offer an industry-leading continuing education assistance benefit that provides up to \$3,500 annually (and up to \$21,000 over the course of a career). Today, nearly all part-time and full-time associates are eligible for this benefit after 60 days of service. In 2024, we expanded this program to interns with 120 days of service or more.

Approximately 5,500 associates, 89% of whom are hourly, took advantage of the Continuing Education Program in 2024. Since inception in 2018, Kroger has invested over \$64 million in tuition reimbursements.

Effective Leaders

Developing highly effective leaders is critical to Kroger's overall associate and customer experience. We continue our positive momentum with strategies and initiatives that support our current leaders, retain talent, and develop strong and capable leaders to enable our future success.

We build and strengthen our leaders' capability and effectiveness through our Career Track Leadership Development framework. This framework outlines both leadership and technical development requirements so our people lead highly effective teams at every step of their career. We release new content each quarter with training, tools and resources to build key leadership skills. We want our leaders to have a deep sense of ownership in the business and passion to improve every day while keeping people at the heart of everything we do.

We invest in our leaders' development by:

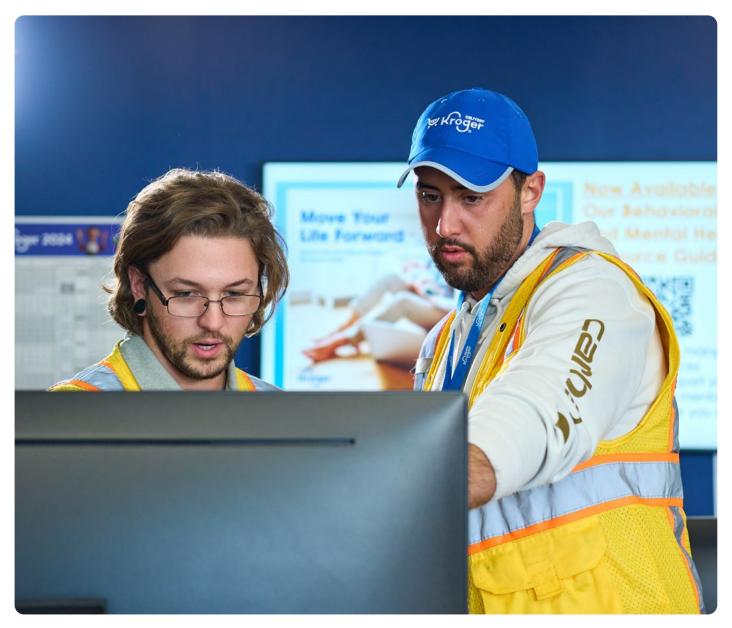
- Offering an extensive catalogue of on-demand and instructor-led development courses designed to support leaders at every career level
- Conducting formal internal development programs and experiences
- Inviting leaders to participate in regional and industry development programs

We continually enhance role-based development programs for store department leaders, management trainees and district managers working across our retail divisions. Our comprehensive 15-week Store Management Training Program includes real-world store experiences, one-on-one coaching, virtual sessions and digital assessments to gauge proficiency and readiness. Our District Manager Development Program also helps associates in these critical roles build the people, financial and technical skills needed to be successful leaders.

Championing Performance

We believe regular, meaningful feedback is critical to personal development and growth. To ensure associates receive timely coaching and conversations regarding their performance, we ask all managers to dedicate time and attention to coaching and developing team members. Through Kroger's Ongoing Connections performance management approach, associates have regular performance and development conversations to set expectations, facilitate career development and discuss potential advancement over time.

To learn more about our continued commitment to improving our associates' experience, please visit the <u>Kroger Careers page</u> on our website.



Labor Relations

Kroger respects our associates' rights to form and join representative organizations of their own choosing. We do not prevent, retaliate or discriminate against workers choosing to associate with any group (or not) or bargain collectively (or not).

Collective bargaining agreements are a regular part of our business and cover many associate matters, including wages, healthcare and pensions. These contracts are regularly negotiated by Kroger's team of labor negotiators who follow a consistent process and take a measured approach to each.

Approximately 64% of our associates are covered by collective bargaining agreements negotiated with local unions affiliated with one of several different international unions. There are approximately 350 such agreements, usually with three- to five-year terms.

In addition to wage investments noted earlier in this section, we invested more than \$398 million in our associates' multi-employer pension plans in 2024. Kroger also provides affordable, high-quality healthcare benefits to eligible associates, investing \$1.2 billion annually in their health and wellness benefits.

Diversity & Inclusion

Kroger's long-standing Values have guided what we do for half a century. Two of these enduring Values are Diversity and Inclusion, which are embedded in our business through access and equal opportunity for everyone. We aim to create an environment of mutual respect for all people in every community we serve and to be a company where everyone has an equal opportunity to build a fulfilling career.

These Values also bring meaningful benefits to our business. When our associates reflect the communities we serve, they choose to stay with us longer and deliver a better customer experience. By offering a wide range of products from a variety of farms and suppliers, more customers choose to shop with our family of companies to nourish their families.

We focus on creating welcoming places, offering equal access to opportunities and building thriving communities wherever we operate.

Welcoming Places

We aim to create a work environment for associates where everyone feels respected, appreciated and that they belong. We foster a sense of connection and belonging among our associates through teambuilding, associate resource groups where all are welcome and more. We also create spaces to listen, talk openly and work together.

Equal Opportunities

We strive to offer our associates equal access to opportunities for jobs, skill-building and engagement. We offer accessible employment for people across the country, and we offer opportunities for all associates to learn and grow. We value and reward associates who are friendly, dedicated and deliver measurable contributions to our business.

Thriving Communities

We extend our focus on creating welcoming places and an environment of mutual respect to everyone in every community we serve. We feed our communities and give back meaningfully through Kroger's Zero Hunger | Zero Waste plan. We offer friendly and engaging places to shop where customers can find the products they love.

We also share opportunities for all potential suppliers to bid for Kroger's business. We believe working with a variety of national and local suppliers helps expand our product assortment to meet our customers' wideranging needs.

Learn more about our Supplier Inclusion Program.

Pay Equity

Kroger aims to offer fair and equal pay for all men, women and people of color. We review our associates' total compensation on both an adjusted and unadjusted basis annually and publicly disclose results.

See our Update on Pay Equity for details.

Please see the Workforce Overview at right for more information about our associates.

2024 Workforce Overview

About Our Associates¹

Kroger offers accessible employment, opportunities to learn and grow, and a wide range of rewarding careers. We believe that by investing in our associates and being an employer of choice, we can deliver an outstanding customer experience every day, every time.

	Full time	Part time	Total
Women	84,646	113,977	198,623
Men	97,178	112,653	209,831
Total	181,824	226,630	408,454

	2023	2024
White Women	27.9%	27.7%
Women of Color	21.2%	20.9%
White Men	28.9%	29.3%
Men of Color	22.1%	22.1%

Reflecting Our Communities

Diversity and Inclusion are among Our Values, and we aim to attract and retain diverse associates who reflect the demographic representation of our country and the neighborhoods we serve.

	U.S. Population ²	Kroger Operating Area Population ³	Kroger Associates ⁴	Totals
White or Caucasian	58.0%	51.6%	57.8%	232,952
Hispanic or Latino	19.4%	22.9%	13.8%	54,437
Black or African American	11.9%	12.8%	16.0%	71,641
Asian or Asian American	5.7%	7.7%	3.9%	16,260
Other	5.0%	5.0%	8.5%	33,750

Kroger publicly discloses our latest EEO-1 report on our Investor Relations site.

^{1.} Totals provided for gender and ethnicity reflect our transition to a new workforce management system, in which associates are no longer required to specify or disclose gender or ethnicity

^{2. 2023} U.S. Census Bureau population estimates

^{3. 2023} U.S. Census Bureau population estimates

^{4.} Kroger data as of fourth quarter of fiscal year 2024

Associate Health. Safety & Well-Being

Safety is one of Kroger's long-standing values, and we believe managing personal health and safety is important to our company's success.

Kroger's senior leadership team and operating unit leaders are responsible for our management approach to associate health and safety, with additional oversight from the Public Responsibilities Committee of the Board. Business units and administrative functions follow an established approach to help protect associates' health and safety.

OSHA Standards

Kroger follows established policies and standards to meet or exceed relevant Occupational Safety and Health Administration (OSHA) requirements, including comprehensive hazard communications and lockout/tagout plans, as well as guidelines for emergency evacuation, personal safety and personal protective equipment (PPE).

In 2024, Kroger improved our safety performance company-wide versus the prior year. Key metrics show improvement in company-wide OSHA reportable injuries, which declined 5.8%, driven by an 8.4% reduction in injuries in supermarket operations. Lost day rates improved for associates.

Safety measures are included in prioritized metrics for facility operations. We continue to deploy virtual, classroom and mobile training through our *Fresh* Start app for safety requirements to reach even more associates and provide reminders about safe work habits.

Learn more about our safety performance.

Retail Stores

In 2024, we continued to refine our company's safety program—AllSafe!—for associates in Retail Operations, Fred Meyer Jewelers and Pharmacy Central Fill operations. The program is in its third year and is designed to increase associates' awareness and attention to personal safety and well-being.

AllSafe! is grounded in four principles:

- Nothing we do is worth risking injury
- Accidents can be prevented
- Safety will be managed
- Safe behavior is a condition of employment for all associates

Kroger has detailed requirements and processes in place to minimize, review and address safety concerns in stores. Through clearly communicated expectations, routine monitoring, and regular safety behavior training and reinforcement, we continue to reduce the number of injuries and accidents in our stores. We provide PPE for associates where appropriate, and we require store leaders to conduct a thorough PPE assessment at least annually to verify it is available and in use.

Any accidents are reported within 24 hours to determine the root cause. The AllSafe! Injury Review helps identify the root cause and accelerates the process to ensure any hazards are identified and addressed quickly and efficiently. Dedicated on-site safety teams meet routinely to review recent injury root causes and safety audit results, and to resolve any issues.

Think AllSafe!

In 2024, Think AllSafe! launched for all retail stores. Think AllSafe! is a web-based platform that houses store-related OSHA training courses to promote safety, including:

- Bloodborne Pathogens Safety Plans
- Emergency Plans and Procedures
- Hazard Communications (chemical safety)
- Hazardous Energy Lockout/Tagout Safety Plans
- Heat Illness Prevention
- Powered Industrial Truck Safety (safe forklift operations)
- Wildfire Safety Plans

Think AllSafe! enables stores to use a digital entry and tracking system to manage OSHA compliance. The platform offers greater visibility to store compliance and makes it easier to provide required information during OSHA inspections.

Supply Chain

Leaders focus on measures to improve associates' health and safety at Kroger-operated food processing facilities, distribution centers and dedicated fulfillment centers, as well as in transit between locations. We extended an existing program for our manufacturing facilities with Safety in Motion[®], Inc. to support Kroger's integrated Supply Chain function.

Kroger expects third-party contractors supporting supply chain operations to uphold the same level of worker health and safety standards. With the expansion of Kroger Delivery, we developed additional training resources to help keep associates safe in our fulfillment centers and on the road.

Supporting Well-Being

To enable our associates to thrive, we take a holistic approach to well-being, aiming to deliver experiences that support and enhance their life, mind and body. We also offer resources that enable managers to create a supportive environment within their teams.

Decisions to refine and expand the range of well-being initiatives reflect our associates' feedback. During the past three years, we expanded access to mental health providers for company healthcare plan participants and created easy-to-navigate guides to available resources, including self-help apps, confidential counseling, family support services, fitness discounts and more. An online benefits guide offers associates a one-stop shop for all well-being resources.

Kroger received Gold in the 2025 Bell Seal for Workplace Mental Health. This program recognizes Kroger as an employer that creates a mentally healthy workplace for our associates through culture, benefits, compliance and wellness programs for the fourth consecutive year.

To promote financial well-being, our financial coaching benefit through Fidelity Investments is available to virtually all associates, including frontline hourly associates. This first-of-its-kind, one-on-one coaching program provides free confidential coaching to help associates navigate a variety of financial topics.

Kroger associates have access to free, confidential counseling 24 hours a day, seven days a week, through Magellan Health. Services generally include shortterm counseling and referrals for associates and their household members who might be dealing with stress, anxiety, depression, grief, relationship challenges and more.

Our neighborhood stores are welcoming places where shoppers see friendly faces, stock up on affordable essentials, grab meals on the go, find nourishing food and medications to improve health, and so much more.

Our Approach

Kroger is in the meal solution business, and we know many families feel overwhelmed and are looking for help. We work to solve "What's for dinner?" for our customers by making meals easier, fresher and more affordable. When meals are a problem to solve, families come to Kroger for the answer.

Keeping our prices low is the foundation of our strategy. Lower prices attract more loyal customers who help us grow our business. This allows us to reinvest in even lower prices, an ever-improving shopping experience, and higher wages for our associates.

Our focus on operational excellence means our customers can enjoy value, selection and convenience. We make it easy and affordable for more customers to shop with us anytime, anywhere.

Kroger's approach to serving our customers is shared across lines of business and corporate functions, including Retail Operations, Merchandising, Marketing, Sourcing, Supply Chain, eCommerce, and Communications & Public Affairs. The company's senior leadership team and Board of Directors provide additional oversight.

Customer Experience

Kroger's brand promise—Fresh For Everyone— expresses our commitment to bringing affordable fresh food to more people in neighborhoods across the country. Today, we serve more than 63 million households annually through convenient local stores and online shopping with Kroger Pickup and Delivery, plus valuable rewards and membership options.

In 2024, we helped customers save through affordable products and promotions, including loyalty discounts, relevant offers and fuel rewards, as well as through *Our Brands* products, which are priced well below national brands at equal or greater quality.

Fresh in Focus

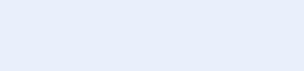
Our customers prioritize fresh when they shop. Kroger has long been a leader in affordable fresh produce and proteins, including expanding access to natural and organic options many years ago.

We want customers to trust the quality and freshness of every item they purchase. To do this, we have strong relationships with regional and local farmers and suppliers, enabling Kroger to source the freshest products. We expanded the *Our Brands* portfolio to include Field and Vine™, which offers regionally grown berries picked at peak freshness.

We are also changing the way we bring fresh to life in our stores. In 2024, we completed the rollout of our End-to-End Fresh initiative to all stores, enhancing operational processes to give our customers more days of freshness in homes. End-to-End Fresh uses technology to improve the in-store shopping as well as order pickup and delivery options. Sourcing more locally grown products also increases days of freshness in our customers' homes and reduces waste.

Our Technology and Supply Chain teams continue to work together to develop new ways to add even more days of freshness to our products. From optimizing delivery routes to simplifying our associates' tasks, we want to ensure our customers can buy food at peak freshness and trust those items will remain fresh in their homes.

We consider efforts to advance food and product safety and quality for our customers as foundational to our business. Read more about <u>our approach to food safety</u>.



FOOD & PRODUCT ACCESS & AFFORDABILITY

Material Topics

CUSTOMER EXPERIENCE

HEALTH & NUTRITION

63M

total households

served annually

370+new fresh items introduced in *Our Brands* portfolio

in digital sales in 2024



23 K

healthcare providers in

Kroger Family of Pharmacies &

The Little Clinic® locations

Expanding our online grocery shopping, pickup and delivery solutions means more people in our communities have access to fresh, affordable food. Today, our customers can place orders and get their groceries when and where they want them, including pickup services at more than 2,300 stores, Kroger Delivery in select geographies, and delivery in as soon as one hour from approximately 2,600 stores through third-party services. Nearly all of our customers have access to our Pickup and Delivery services.

In 2024, digital sales increased to more than \$13 billion, and the number of households engaging with Kroger digitally increased 11% versus the prior year.

Boost Membership

To provide an easier way to save for our loyal customers, we developed and introduced Boost by Kroger Plus, the industry's most affordable grocery delivery membership program. Available in two plans, Boost Essential (\$69/yr) and Boost (\$99/yr), members receive unlimited free delivery on orders of \$35 or more, 2X Fuel Points on groceries and general merchandise through Delivery, Pickup and in stores, exclusive member offers, and streaming on us with Disney+ (with ads), Hulu (with ads) or ESPN+.

We estimate that Boost memberships can save customers more than \$1,100 per year on grocery delivery, fuel and streaming fees. Restrictions apply; please see more details online.

Affordable Fresh Food

At Kroger, our customers do not have to choose between a good meal and a good deal. That means customers can get the products they need, want and love for their families with clear savings right at the shelf. In addition to our everyday low prices, Kroger simplified promotions and lowered prices on thousands of items from summer essentials to most-loved staples. With Kroger's Fresh & Quality Guarantees, customers never have to compromise high quality for low prices.

We connect with our customers through low prices, *Our Brands*, special promotions and relevant offers that make cooking at home easier. We have a long history of successfully serving more customers as we grow by lowering prices, investing in the shopping experience and expanding our selection of fresh, affordable food.

In 2025, we lowered prices on thousands of additional products to help our customers stretch their grocery budgets even further.

In addition to everyday promotions and discounts, our combined paper and digital coupons help our customers save on their purchases. Kroger also makes it easy for customers to pay online through Electronic Benefits Transfer (EBT) for the Supplemental Nutrition Access Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), removing additional barriers to food access like store location and transportation. Kroger continues to invest in lower prices to make shopping on a budget easier and more affordable for our customers.

Special Markdowns

We have programs in place to discount imperfect but still safe-to-eat fresh items in stores to make them even more affordable. This includes our popular produce "redbags," which are bundles of discounted fresh produce items like apples, bananas and oranges.

We offer markdowns on fresh items across our stores every day. In 2024, we continued to test dynamic markdown processes to improve how and when we discount fresh produce and other short-dated items. For online shoppers, the Kroger Delivery team offers a "flash sale" feature that highlights high-inventory items every day, giving customers special discounts and even more savings.

Our Brands

Kroger's popular and affordable *Our Brands* have a leading position among brands in the U.S., and our customers tell us the quality of *Our Brands* is a key factor in delivering a better shopping experience. We have five billion-dollar brands—Kroger®, Private Selection®, Simple Truth®, Home Chef® and Bakery Fresh—and more than 13,000 exclusive, quality-quaranteed items that families know they can trust.

In 2024, we focused on refreshing our Kroger®, Private Selection® and Simple Truth® lines, as well as expanding our opening-price-point brand known as Smart Way® and our Hispanic-inspired brand known as Mercado®.

In all, we launched more than 900 new, unique *Our Brands* products in 2024, including over 370 fresh items. The Kroger team actively monitors food trends throughout the year to understand what our customers are craving and ensure we have those items on our shelves. We aim to bring every customer the high-quality, affordable products they love—from pantry staples and fresh foods to ready-to-heat, restaurant-quality meals.

Kroger continually introduces new and reformulated products for our customers. During the first quarter of 2025, *Our Brands* introduced more than 260 new items.

Loyalty & Rewards

More than 60 million households are enrolled in our popular Kroger Plus loyalty program. Membership unlocks special lower prices, fuel discounts, exclusive digital offers and the chance to direct a portion of the company's charitable giving to local nonprofit organizations through Kroger Community Rewards.

We carefully measure how we serve our customers by analyzing detailed sales, loyalty, operations and customer satisfaction metrics. Kroger receives positive feedback from our customers about our loyalty program and rewards. Satisfaction surveys and purchasing insights also inform improvements in service, product quality and item assortment.



Access to affordable, nutritious foods, whether fresh, frozen or shelf-stable, and convenient health services are essential to our customers' well-being. We recognize that healthy food can nourish individuals, slow the progression of illness and transform entire families and neighborhoods.

That's why we're committed to advancing nutrition and health through our core grocery operations, the Kroger Health business and more. From providing products and services to engaging with customers and communities, we help expand access to healthy and nutritious food that supports healthier lives.

Our approach to health and nutrition spans multiple areas of our business, from Merchandising and Retail Operations to Kroger Health, eCommerce and Marketing. We aim to make healthy living easier for our customers, both in-store and online, through relevant products, expert guidance from our dietitians and health services provided by our pharmacies and The Little Clinic®.

Kroger Health leads the strategy behind our work to expand access to care in the communities we serve. A team of 23,000 healthcare practitioners, including pharmacists, nurse practitioners, dietitians and technicians, serves more than 17 million patients annually. They are available to patients every day to address health needs. From dietary counseling to questions about medications, patients can find expert, convenient care right in their neighborhood store or online.

Our senior leadership team and the Public Responsibilities Committee of the Board oversee progress on our health and nutrition programs, as well as pharmacy and clinic safety measures.

Eating for Better Health

At Kroger Health, we believe in eating for better health, meaning that healthy food has the power to nourish families and improve health. Based on insights, experience and the latest research, we know a thoughtful, balanced approach to eating and enjoying food promotes healthier lives and may help prevent illness before it starts.

In May 2025, Kroger Health hosted its first Nourishing Change Conference in Cincinnati—an inclusive, cross-sector summit focused on the future of health and well-being in America. This event reflects our ambition to improve healthcare delivery, promote eating for better health and live our brand promise: Fresh for Everyone.

The Nourishing Change conference brought together experts from retail, consumer packaged goods, healthcare, technology and policy to discuss a new path forward led by innovation, access and equity.

Participants joined curated tracks focused on food and nutrition security, healthy eating and integrative care. Panel discussions highlighted the evolving role of retail solutions in healthcare, the intersection of pharmacy and wellness, and the power of behavioral science in driving better outcomes.

As part of Kroger's commitment to innovation, the event also featured an emerging brands competition, showcasing the next generation of health-forward products and services.

Nutrition Insights & Personalization

During the past year, Kroger Health introduced ways to help customers make more-informed nutrition decisions through our OptUP® Program.

We recognize that making healthy food choices can be challenging, so we developed the OptUP Program to simplify choosing nourishing foods while shopping and to create access to registered dietitian nutritionists (RDNs). The FoodHealth Score, powered by the FoodHealth Company, rates food items from 1 to 100 based on nutrient density and ingredient quality as part of the OptUP Program. The more nutritious the food, the higher the nutrition score. The scoring system, which seeks to give customers a fast, reliable way to evaluate the healthfulness of their food, can be used while customers shop online or scan UPC codes in-store. Kroger loyalty members can access their Nutrition Insights, helping them understand the healthfulness of their grocery purchases and shopping habits over time.

We improve nutrition security through other products and services, including our virtual nutrition counseling service, which offers two-way video chat appointments with Kroger Health registered dietitians available to customers across the U.S.

In early 2025, Kroger Health committed to expanding access to registered dietitians by launching a free 30-minute 1:1 virtual nutrition coaching session available to all Kroger Plus loyalty members. The new offering provides personalized guidance from a registered dietitian on topics such as budget-friendly meal planning, product recommendations and practical nutrition tips. By making credible, customized nutrition support accessible at no cost, Kroger is helping individuals and families make lasting, positive changes to their health and well-being, all in a convenient, accessible format.

Together, these innovations reflect Kroger's commitment to making healthy living easier and more accessible for everyone.



Kroger's OptUP Program helps customers choose nutritious options. Shoppers can easily find better options by checking FoodHealth Scores, which reflect a food's ingredients and nutrition facts, on the Kroger app or online.

We recognize that upstream factors like existing policies and legislation can affect equitable access to health services. We are working with policymakers to design and fund initiatives that increase patient access to more nutritious foods and expert nutrition advice while measuring outcomes to promote widespread adoption across our health ecosystem.

Kroger Health conducts federal advocacy efforts to promote policies that increase the accessibility and affordability of our healthcare services. Efforts include extending scope-of-practice laws and promoting new ways to help patients link better eating habits with improved health outcomes.

In 2024, Kroger Health's advocacy team secured a five-year extension of pharmacists' authorities under the Public Readiness and Emergency Preparedness (PREP) Act. This enables seniors with Medicare coverage to continue accessing vaccines and certain testing and treatment options at pharmacy locations in our stores.

Prescription Drug Awareness

Kroger Health also offers solutions to help customers manage medications safely at home. Kroger Health has been working with EVERFI on a Prescription Drug Safety Education curriculum for high school students since 2018. This curriculum focuses on raising awareness and encouraging students to make safe decisions around prescription medications. It helps students manage difficult situations and choices in high school and beyond.

Of students participating in the program:

- 89% reported being able to identify signs of prescription medication misuse and abuse
- 88% were confident in their ability to refuse the offer of prescription drugs
- 90% confirmed they understand the consequences of sharing, selling and misuse of prescription drugs

To further reduce prescription medication misuse, Kroger Health, Cardinal Health Foundation and local police stations typically host drug take-back events twice a year at pharmacy locations across the country. Since the program started in 2016, it has resulted in the collection and proper disposal of 220,000 pounds of medications and served more than 86,000 visitors across 22 states.

Access to Vaccines

Kroger Health plays a vital role in promoting public health by offering convenient access to vaccines that help prevent the spread of respiratory illnesses such as the flu, RSV and COVID-19. With our Family of Pharmacies and Little Clinics open seven days a week, Kroger provides both walk-in and appointment-based services, making immunizations accessible to the people we serve.

To expand our reach, we offer healthcare solutions to meet people where they are. Our team is available to offer on-site health and vaccine clinics for local businesses, schools and organizations, further demonstrating our commitment to helping keep our communities safe and healthy.



As Kroger grows, our associates, customers and communities benefit. We continue to affirm and expand our long-standing commitment to operate responsibly, engage local leaders and give back meaningfully to our communities.

Our Approach

We challenge ourselves to create a stable, successful organization that will support our associates' growth, improve our customers' shopping experience and reflect the changing ways America eats. Our growth creates the best environment—now and in the future to bring lower prices and more choices to more people, help secure the future of stable union jobs and invest to help build stronger, thriving communities.

We strive to be an essential part of our communities. Our stores are community hubs and gathering places where our associates and customers see neighbors, grab a quick meal, prepare for special celebrations, fill prescriptions, discover new items for their families and more.

We build and strengthen community within each of our stores, in our neighborhoods, and in the towns and cities we call home. In many stores, we design welcoming spaces where people can gather and discover new foods and flavors together.

Kroger's centralized Communications and Public Affairs team oversees how we support and give back to our local communities. This team leads community engagement, charitable giving, and federal, state and local government relations. The Public Responsibilities Committee of the Board oversees this work.

Local Communities

Every town and city is unique, and we proactively engage local elected leaders, city administrators, chambers of commerce, business associations, nonprofit organizations and others to listen and learn about local opportunities and challenges and consider how Kroger might contribute. Our leaders often volunteer time and serve on local nonprofit organization boards and councils.

Kroger's open-door approach to community engagement includes sharing updates on our business, discussing community priorities, identifying opportunities for collaboration, advocating for policy changes and more.

We follow key principles as a trusted business wherever we operate. These include:

- Understanding national and local issues of importance
- Fostering open dialogue with community leaders
- Offering easy ways for our associates, customers and students to support our Zero Hunger | Zero Waste impact plan
- Participating in and volunteering to serve community and nonprofit organizations
- Directing charitable donations to local causes and programs, particularly those aligned to our Zero Hunger | Zero Waste plan

Investing in Our Communities

Kroger invests in initiatives and projects that advance our company's growth and strengthen the communities where we live and work. We are making investments in both our brick-and-mortar stores and our eCommerce business.

In 2025, we are building more new stores and managing more renovation projects than in the past five years combined. We are on track to deliver 30 major store projects in our communities in 2025. We expect to increase store openings by 30% in 2026 with more efficient store layouts and faster construction timelines.

We believe offering a combination of stores that are fun to shop in and convenient delivery options is the best way to bring more affordable fresh food to more people across the country. We continue to invest in improving the shopping experience and introducing new mobile features that give customers more choices in when and how they receive their groceries.

As Kroger grows, our communities benefit. Our capital investments often create local jobs, such as our Kroger Delivery fulfillment centers, temporary construction jobs and growth in service industries supporting our new stores and facilities. New jobs mean new opportunities for our associates and greater positive economic impact in the local communities we serve.

Material Topic

LOCAL COMMUNITIES



\$44M

in giving to the USO for active-duty military service members & families since 2010

\$3.1B

in spend with verified diverse-owned suppliers in 2024



64K

students volunteering in communities to support Zero Hunger | Zero Waste



\$46M

in customer-directed **Kroger Community** Rewards for local nonprofit organizations in 2024



Disaster Relief

Our customers and communities know they can count on Kroger in their time of need. As an essential business, our teams track and prepare for storms throughout the year, routing trucks to warehouses and stores so our customers can stock up on critical supplies, and staging generators and other equipment to move in quickly, restore power and open stores if needed.

In 2024, Kroger provided more than \$2.3 million in disaster relief funds and in-kind food donations. including a \$500.000 grant to the American Red Cross Annual Disaster Giving Program to help the organization prepare for disasters and respond with care and comfort when they happen. We also often support Feeding America food banks with cash and food donations to help affected or displaced individuals and families.

Last year, Kroger assisted communities in Texas after severe flooding; helped communities in Florida, North Carolina, Tennessee and Georgia after Hurricanes Helene and Milton; and supported local relief efforts after devastating wildfires in Southern California.

In situations where the National Guard is deployed to provide disaster relief, we may also work with the United Service Organizations (USO) to deploy a USO | Kroger Mobile Canteen to help feed first responders.

Zero Hunger | Zero Waste

Kroger regularly engages our associates, customers and communities to advance our Zero Hunger | Zero Waste impact plan. We work closely with hundreds of national and local nonprofit organizations that help rescue surplus food from our stores and provide meals for neighbors in need.

Every year, we also recognize Kroger store teams and individual associates who generously serve our communities. Nineteen associates were recently named Community Service Award recipients in honor of their volunteer service to advance Zero Hunger Zero Waste in 2024. Kroger directed a donation to each awardee's nonprofit hunger relief or sustainability organization of choice to express our gratitude.

Please see our associate Community Service Award Winners for 2024.

Youth Zero Heroes

We also encourage students to get involved in programs that end hunger and waste in their local communities. Six years ago, we introduced a Zero Hunger | Zero Waste youth engagement program in collaboration with InnerView, a leading platform to empower student volunteers. The program continues to grow every year.

Through our Zero Heroes program, high school students serve local nonprofit organizations and earn recognition for different levels of service: at least eight, 20 or 40 hours. They also develop a personal community service résumé detailing their work to use in college or job applications. Sample activities include volunteering at a local soup kitchen, packing meals at a food bank, organizing a food drive or starting a school recycling program.

During the 2024-25 school year, more than 17,500 students across the U.S. earned recognition as youth Zero Heroes. These students completed nearly 128,000 hours of service in 631 local communities across the country. Last year, we also honored 117 youth Zero Heroes at 40+ hours of service. Since the program began, student participation has increased every year, totaling more than 429,500 hours since 2019. InnerView estimates the value of this total positive community impact is \$15.2 million.

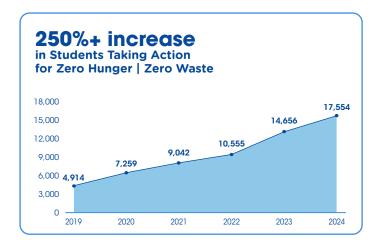
Youth Advisory Council

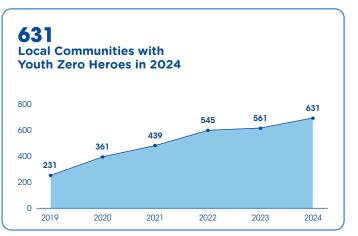
During the 2024-25 academic year, Kroger created a 15-member Youth Advisory Council of student leaders who were willing to connect and discuss issues in their communities related to food security, waste reduction, recycling and more. Each student participated in Kroger-led collaborative sessions with guest speakers and design challenges to create Zero Hunger | Zero Waste-aligned community projects, supported by charitable micro-grants from Kroger. This was the third consecutive year that the Youth Advisory Council engaged in Zero Hunger | Zero Waste initiatives.

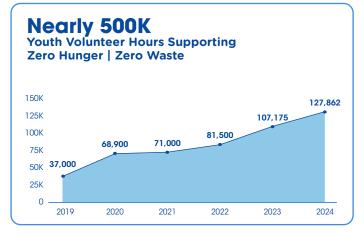
Kroger's Zero Heroes youth program is offered to all students ages 14 to 24 in the United States. Learn more about the InnerView platform at www.innerview.org.

More information about Zero Hunger | Zero Waste is available here.









Kroger has a long history of giving back generously to our communities. We support national and local nonprofit organizations by donating food and funds to help our neighbors and neighborhoods.

In 2024, Kroger donated a total of \$346 million to our communities in food and funds combined, including \$276 million to hunger relief. Our strategic approach to charitable giving includes several ways we support national partners and local communities:

- In-kind food and product donations to advance
 Zero Hunger | Zero Waste
- Company-funded donations to nonprofit organizations that meet our <u>Charitable</u> Giving Guidelines
- Grants from The Kroger Co. Foundation, the company's private foundation established in 1987
- Grants from The Kroger Co. Zero Hunger |
 Zero Waste Foundation, a nonprofit public charity
 established in 2018
- Local customer-directed donations to nonprofit organizations through Kroger Community Rewards

We align the majority of the company's charitable giving to national, regional and local organizations and programs that feed people. In 2024, we directed a total of 518 million meals to our communities, bringing our cumulative total to 3.9 billion meals since 2017. This includes work with local food banks and pantries to support innovative food delivery models, including mobile or stationary food pantries that increase access to fresh food.

We maintain long-standing relationships with national organizations that support our local communities. These include the American Red Cross, Feeding America and its network of affiliated local food banks, World Wildlife Fund and the USO, among others.

Prioritizing Hunger Relief

Several years ago, we began aligning more of Kroger's total charitable giving to our Zero Hunger | Zero Waste impact plan. This includes cash donations and gift cards, foundation grants, surplus fresh food donations through our Zero Hunger | Zero Waste Food Rescue program, and other food and product donations.

At the local level, our charitable dollars help Feeding America-affiliated food banks and other nonprofit organizations build capacity to pick up more surplus fresh food from our stores, test and implement new food recovery and delivery models, and feed more people in need.

In addition to company donations, we invite our customers to round up their purchase to the nearest dollar when they shop with Kroger or donate directly to the Zero Hunger | Zero Waste Foundation to support our mission to end hunger and waste. Funds help provide grants to eligible organizations aligned with our impact plan.

In 2024, our generous customers donated a total of \$8 million to the Zero Hunger | Zero Waste Foundation, which directed grants to designated local food banks and hunger relief agencies.

For more details on the work of our nonprofit foundations and examples of specific grants, please see The Kroger Co. Foundation 2025 Report and The Kroger Co. Zero Hunger | Zero Waste Foundation 2025 Report.

Donating Surplus Food

Every day, associates across our family of companies recover and donate surplus fresh food for our communities through our Zero Hunger | Zero Waste Food Rescue program. Kroger developed and introduced this industry-leading program in collaboration with Feeding America more than 16 years ago, then called the Perishable Donations Partnership.

Every Kroger-operated store is linked to a local hunger relief agency with the capacity to safely pick up and redistribute surplus fresh food. Our distribution centers, fulfillment centers and food production plants also donate surplus food when possible.

We work closely with the Feeding America network of food banks and other hunger relief partners to continually improve our Food Rescue program, expand the number of items eligible for donation and recover more fresh, nutritious food.

In 2024, 100% of our stores actively participated in the Food Rescue program. Including surplus food recovered from all facilities company-wide, Kroger donated a total of 119 million pounds of surplus food for our communities. Since 2017, our associates have donated nearly 815 million pounds of surplus food for our neighbors.

For more information about Kroger's Food Rescue program and how donating fresh surplus food feeds people and supports our sustainability goals, see the Waste & Circularity section of this report.

3.9B
meals donated since 2017
Made possible through a combination of:
\$1.8B
in charitable monetary donations to food banks and other hunger relief agencies in our local communities

815N
pounds of surplus food donated to our communities

Supporting service members and their families is a priority for our company. Kroger has contributed more than \$44 million in support to the USO through corporate funds and customer donations during the past 15 years. We are recognized as the largest cumulative donor in the organization's 84-year history.

The USO | Kroger Mobile Canteen is a company-wide collaboration between the USO and Kroger. Working together, we developed a new way to extend the Mobile USO fleet with custom trucks and mobile canteens to deliver food and support to military communities that are currently underserved. Three USO | Kroger Mobile Canteens are stationed in Atlanta, Kansas City and Salt Lake City to serve military members and families when needed most.





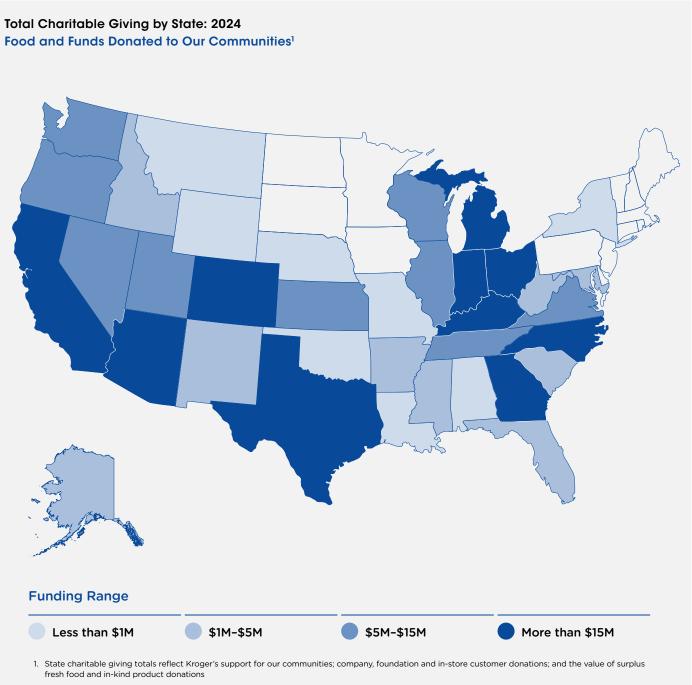
Through these mobile canteens, the USO provides temporary access to nutritious food, strengthening our service members and their families and offering warm, comforting meals in remote locations where troops are deployed. In 2024, the USO | Kroger Mobile Canteens hit the road to support over 42 military events and serve more than 37,000 people across the nation, including Family Days, Fleet Weeks, disaster relief services and training exercises.

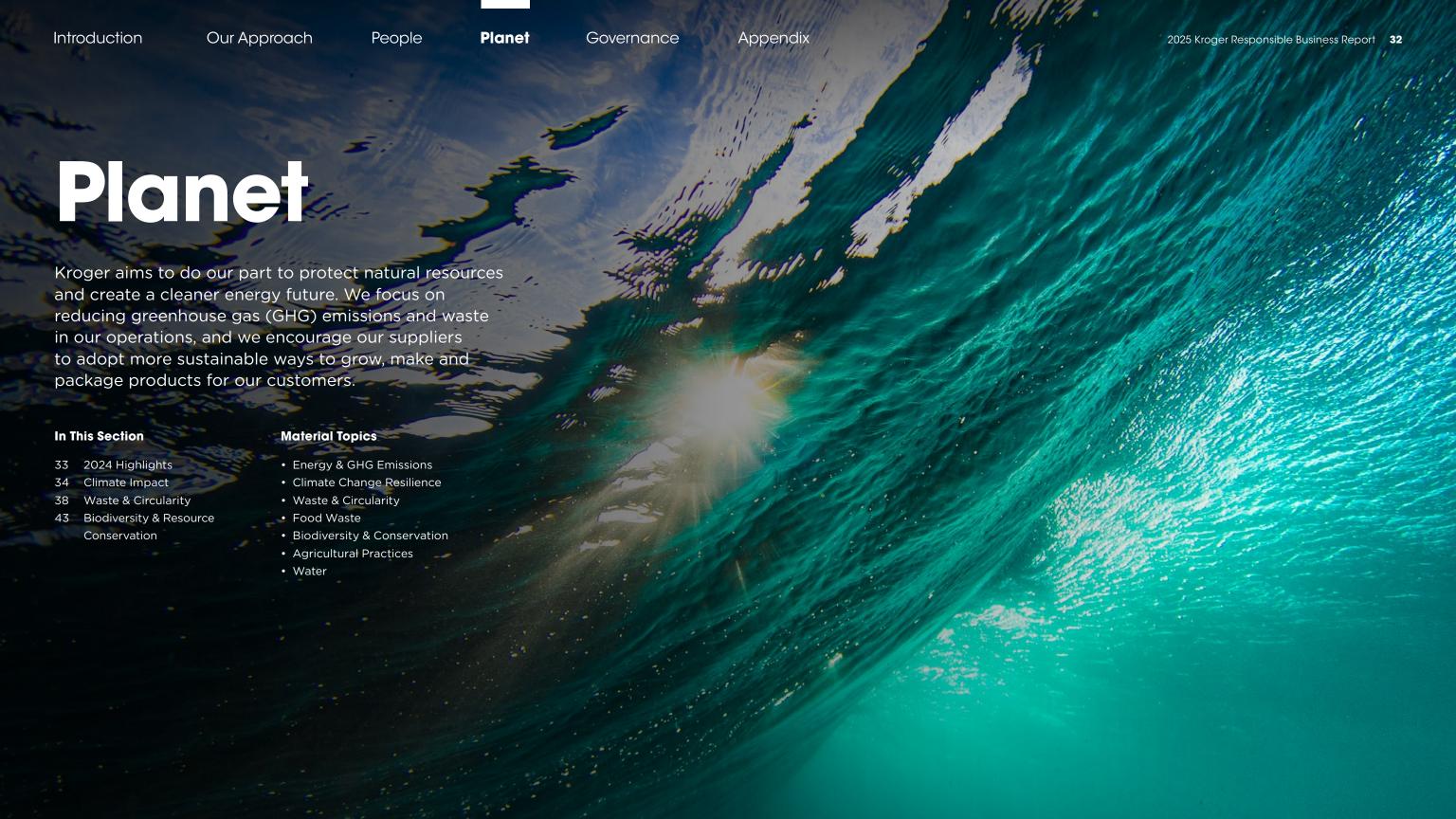
Kroger Community Rewards

We give our customers an easy way to direct Kroger's charitable donations to the local nonprofit organizations that matter most to them through Kroger Community Rewards. This program makes it easy for eligible nonprofit organizations of all sizes—including community schools, teams, churches, animal shelters and other groups—to raise money for their cause.

Nearly 3 million loyal customers and thousands of local organizations are currently enrolled in Community Rewards. In 2024, Kroger donated a total of \$46 million in company-funded Community Rewards to local nonprofit organizations in towns and cities across the country.







Planet: 2024 Highlights

Kroger's Zero Hunger | Zero Waste impact plan expresses our ambition to reduce emissions, operational waste and food waste, and improve Our Brands packaging sustainability. We also encourage our suppliers to protect natural resources, habitats and wildlife on land and in water.















Related Resources

OUR BRANDS SUSTAINABLE PACKAGING GOALS





Climate Impact

Just as changing temperatures and weather patterns may affect our business operations and supply chain, energy sourcing and GHG emissions from our operations may affect our planet. That's why we evaluate and manage the company's resilience to climate change and take steps to transition our operations to cleaner, more sustainable energy systems.

Energy & GHG Emissions

Kroger's senior leadership team and Public Responsibilities Committee of the Board oversee our approach to managing climate impacts and resilience. Multiple internal teams across our lines of business work together to establish and achieve goals, including Retail Operations, Supply Chain, Manufacturing, Sourcing, Finance and Communications & Public Affairs.

Our strategy to reduce the company's impacts on the environment includes the goals we set, the actions we take to achieve our goals and our assessment of related risks and opportunities. We put this strategy into action when our business units identify emissions-reduction opportunities, when we pilot new technologies to understand if and how they will benefit us, and when our teams develop the operational policies, roadmaps and financial plans to reduce our emissions over time.

Additionally, Kroger monitors and responds to a changing climate—such as changing temperatures and weather patterns—to maintain our ability to operate and serve our customers. We also consider how new technology, consumer trends and regulatory requirements may present risk or opportunity for our business.

A portfolio of representative projects from across our business that are needed to achieve our current GHG reduction goal of 30% by 2030 was presented in our initial GHG Reduction Goal Roadmap. We continue to revisit our approach to reflect changes in decarbonization activities over time, the latest learnings from active pilots and possible future projects.

Emissions-reduction projects include:

- Reducing our reliance on electricity through operational efficiencies
- Reducing refrigerant emissions by minimizing leaks and using lower-global warming potential (GWP) refrigerants
- Transitioning to EVs in our fleet
- Piloting new on-site solar installations
- Purchasing green power from our utilities
- Realizing the benefits of grid-greening (passive procurement) in our emissions factors over time

We consider each GHG reduction opportunity in the context of possible impacts to our business, including emissions, costs and capacity to do the work.

Emissions Disclosure

In 2024, Kroger's Scope 1 and 2 (market-based) GHG emissions decreased by 3.3%, which represents a 14.9% cumulative reduction since the 2018 goal baseline.

By focusing on improving our data management and calculation accuracy, we are laying the foundation for future mandated disclosures. In fact, we completed the a full Scope 3 GHG emissions inventory for 2024 and plan to do so annually moving forward.

Total GHG Emissions

Scope 1 and 2 emissions, market-based—MTCO₂e

2018	5,774,060 (baseline)	
2019	5,967,865	
2020	5,275,845	
2021	5,251,448	
2022	4,894,705	
2023	5,081,613	
2024	4,916,373 (-14.9% from baseline)	

MTCO2e = metric tons of carbon dioxide equivalent

Material Topics ENERGY & GHG EMISSIONS

CLIMATE CHANGE RESILIENCE

Goal: 30% reduction in Scope 1 and 2 GHG emissions by 2030







Emissions Category	MTCO₂e	Year-Over-Year Change (%)
Scope 1 total emissions	2,240,536	-2.1%
Scope 1 (stationary)	563,167	+2.0%
Scope 1 (mobile)	348,347	-6.2%
Scope 1 (refrigerant emissions)	1,329,023	-2.6%
Scope 2, location-based (purchased electricity)	2,709,318	-1.1%
Scope 2, market-based (purchased electricity)	2,675,836	-4.2%
Total (S1 + S2 location-based)	4,949,855	-1.6%
Total (S1 + S2 market-based)	4,916,373	-3.3%
Scope 3 (complete) ¹	110,249,834	-

^{1.} Scope 3 emissions reflect all relevant Scope 3 emissions. A detailed breakdown is shown in the table to the right. Because we have updated our calculation methodology for our Purchased Goods & Services emissions and due to a time gap between our 2021 baseline and this 2024 emissions footprint, we are not sharing year-over-year performance trends

Scope 1 emissions decreased by 2.1% in the 2024 reporting year. Stationary emissions, most notably natural gas, increased due to consumption patterns. Mobile emissions decreased slightly, reflecting various fluctuations in miles run and fuel used in our Delivery, distribution and technician fleets. Refrigerant emissions declined, reflecting our focus on shifting to lower-GWP refrigerants in our stores and the continued rollout of improved leak detection monitoring technology.

Scope 2 emissions decreased in the reporting year: Location-based emissions decreased by 1.1% while market-based emissions decreased by 4.2%. This change was driven by a reduction in electricity consumption as well as minor adjustments to emissions factors, including using supplier-specific emissions factors. Normalized Scope 1 and 2 emissions (per 1,000 square feet) decreased from 23.82 in 2023 to 20.60 in 2024, reflecting these operational changes.

Scope 3 emissions reported for 2024 include all categories relevant to Kroger. Due to updates to our calculation methodology and an extended time period since we calculated our 2021 baseline, we are not reporting on year-over-year trends for Scope 3.

As we reported for our 2021 baseline, there are two major emissions categories in Kroger's value chain: upstream Purchased Goods & Services (PG&S) emissions, which include both Energy & Industry (E&I) and Forest, Land and Agriculture (FLAG) emissions, and downstream Use of Sold Products. Collectively, these two categories make up approximately 90% of our total Scope 3 GHG emissions.

2024 Scope 3 GHG Emissions Details—MTCO₂e

	Scope 3 Emissions Category	MTCO ₂ e	Percent of total
	1 Purchased Goods & Services—Energy & Industry (E&I)	42,459,735	38.5%
	1 Purchased Goods & Services—Forest, Land & Agriculture (FLAG)	18,255,616	16.6%
	2 Capital Goods	583,108	0.5%
Upstream	3 Fuel & Energy Emissions	761,194	0.7%
Opstream	4 Upstream Transportation & Distribution	2,053,859	1.9%
	5 Waste from Operations	345,837	0.3%
	6 Business Travel	27,952	0%
	7 Employee Commuting	597,923	0.5%
	10 Processing of Sold Products	5,286	0%
Downstream	11 Use of Sold Products	40,775,781	37.0%
	12 End-of-Life Treatment of Sold Products	4,348,119	3.9%
	15 Investments	35,424	0%
Total		110,249,834	100%

PG&S emissions reflect a broad array of activities in our supply chain, from the processing and distribution of ingredients, packaging and finished products to the technology used in our operations, legal and consulting services, on-farm activities in our agricultural supply chains and more.

For the 2024 inventory, we updated our calculation methodology for PG&S emissions to reflect supplier-specific emissions factors captured from third-party sources for top suppliers. Improving the consistency and quality of PG&S emissions will remain a focus moving forward as industry groups and companies seek more standardized metrics and methods.

Downstream, emissions from Use of Sold Products result from fossil fuels and fossil fuel-powered equipment sold in our operations, most notably from our fuel centers. The End-of-Life Treatment of Sold Products category primarily reflects estimates for the food waste and packaging in products that our customers buy, use and dispose.

Kroger uses the GHG Protocol methodology to calculate our GHG emissions. More detailed disclosure is provided in our CDP Climate disclosures and in the <u>Appendix</u> of this report.

In 2024, we completed two years of work with a consulting partner to assess the feasibility of setting a GHG reduction goal aligned with the requirements of the Science Based Targets initiative (SBTi). Our extensive analysis established our first complete Scope 3 GHG emissions inventory; refreshed our initial Scope 1 and 2 GHG reduction roadmap for 2030 to reflect the latest developments; and reviewed SBTi requirements for Scopes 1, 2 and 3 on specific time horizons to determine how they could affect Kroger's operations and financials.

Ultimately, we learned that the detailed SBTi framework and target-setting requirements for validation are challenging for our business as a retailer to achieve in a way that is sustainable and enables future growth. As a result, we are maintaining Kroger's ambition to achieve our Scope 1 and 2 goal and continue reducing GHG emissions beyond 2030.

Energy Efficiency

In 2024, we continued implementing projects that reduce energy consumption in our stores. We placed glass doors on open refrigerated cases in our stores, saving an average of 225,000 kilowatt-hours (kWh) of electricity and 16,000 therms of natural gas per store annually. We also transitioned multiple areas of our stores to new or more efficient LED lighting, including overhead lighting (35,000 kWh saved per store), parking lot lighting (100,000 kWh saved per store), open medium-temperature cases (10,000 kWh saved per store) and track lighting in Produce departments (23,000 kWh saved per store).

Renewable Energy

Kroger currently has solar arrays installed at 14 facilities, which generated 3.2 million kWh of renewable power in 2024. Of that, Kroger claimed 1.7 million kWh as zero-carbon energy in our GHG emissions inventory. We also operate two facilities equipped with anaerobic digestion technology, which processes food waste or food production by-products into biogas, which in turn can be converted to renewable electricity.

In 2024, Kroger purchased 48,600 megawatt-hours (MWh) of zero-carbon power from our energy providers. This is a decline from the prior year due to changing contract opportunities and factors in our portfolio. This year, Kroger began procuring renewable energy from a new installation located at the Cincinnati Zoo & Botanical Gardens' 30-MW solar farm on its Bowyer Farm property outside of Cincinnati.

Kroger also accounts for the increasing amount of lower-carbon and renewable electricity generation sources coming online in different regions in our GHG inventory.

Refrigerant Emissions Reductions

During the last decade, we have continued to transition away from ozone-depleting substances to other refrigerants across our systems. In our stores, we use a four-pronged approach to managing refrigerant emissions:

- Proactively monitoring, mitigating and reducing leaks
- Replacing aging refrigeration systems to improve energy efficiency and reduce refrigerant charge/emissions
- Properly managing refrigerant inventory to reduce waste and promote responsible reclaim practices
- Transitioning to refrigerants with a lower GWP.

Kroger is part of the U.S. Environmental Protection Agency's (EPA) GreenChill program, through which we set annual targets to reduce refrigerant emissions in retail stores

Kroger's <u>Refrigerant Management Policy</u> for our stores outlines the company's procedures and documentation for all refrigerant gas handling. Kroger has a zero-tolerance leak-rate policy, and all relevant associates and technicians must read, sign and adhere to it. In 2024, the refrigerant leak rate in our stores improved from 11.4% to 11.1%.

We are actively transitioning stores to use new infrared detectors that identify lower concentrations of leaked refrigerants. By the end of 2024, we had transitioned 2,298 stores to this new technology and expect to transition 100% of stores by the end of 2026.

In addition, we transition facilities to lower-GWP refrigerants, including in California to achieve the necessary portfolio GWP in relevant stores by or before state regulatory guidelines. We also operate and maintain our company-wide refrigeration fleet in anticipation of refrigerant supply changes resulting from the federal American Innovation and Manufacturing Act.

In 2024, we built six new retail stores with CO_2 refrigerant technology to evaluate and inform the future rollout of this technology in our stores. Moving forward, we aim to build all new stores with CO_2 refrigerant systems.

In addition, we are transitioning to propane refrigerant, which has lower GWP, in all stand-alone refrigerated cases in stores. More than 16,000 existing units use propane today, and all new stand-alone cases will use propane moving forward.

In general, we plan to use lower-GWP refrigerants that are commercially and financially viable, which includes evaluating whether new refrigerants can be dropped into an existing system or whether a new system is required.

Kroger continues to track emerging refrigeration technologies and is an active member of the North American Sustainable Refrigeration Council, which aims to help retailers overcome barriers to the adoption of natural refrigerants.

We continue to refresh our truck fleet, replacing older vehicles with more fuel-efficient models. In 2024, we replaced more than 70 trucks with new units. As a long-time partner of the U.S. EPA SmartWay program, we aim to reduce truck miles and emissions through dynamic routing, truck speed limits, automatic shutdown for truck idling and automatic transmissions to manage gear splits.

During the past several years, we converted all new refrigerated trucks in California serving our Ralphs and Food 4 Less divisions to hybrid electric/diesel trailers. Our Monroe, OH, fulfillment center (FC) uses electric Kroger Delivery vans. We use electric yard tractors at three facilities and received our first two on-highway electric tractors in 2025.

As of the end of 2024, Kroger had installed EV charging at 140 stores in the following states: Arizona, California, Colorado, Georgia, Indiana, Maryland, Michigan, North Carolina, Nevada, New Mexico, Ohio, Oregon, South Carolina, Virginia, Washington and Wyoming. Our infrastructure includes several direct current super-fast chargers capable of generating 350kW—several times more power than typical fast chargers—to offer convenient charging services to our customers.

Since 2020, EV chargers installed at our stores have provided over 38 million kWh of electricity to local consumers through 1.6 million charging sessions.

Climate Change Resilience

As a responsible business, we continually evaluate the resilience of our facilities and operations amid changing temperatures and weather so we can continue to serve our customers well into the future.

Kroger's management approach to climate resilience includes conducting a quantitative climate risk assessment to determine the likelihood of different physical climate risks affecting our operations, such as drought, extreme heat or extreme precipitation. We assessed risk at representative facilities in different geographies to determine whether future impacts could potentially increase operating costs for these 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). These were taken from the 1/16th degree localized constructive analogs (LOCA) climate dataset for 2030 and 2050 timeframes.

For each physical climate risk, we also identified potential financial impacts. We recognize the limitations of these metrics to capture the potential long-term financial impacts of climate risks; however, they provide important context. Working with a third-party consultant, we concluded that the physical risks modeled do not pose a substantive financial threat to our operations.

We will revisit this analysis periodically and plan to expand it to include a climate risk assessment using scenario modeling for select parts of our supply chain during the remainder of 2025.

To prepare for and manage potential physical climate risks, including natural disasters and business disruptions to our supply chains, we maintain over 200 business resilience plans. Kroger has also installed technologies and developed processes to enable our stores, plants and distribution network to respond quickly and remain operational to serve our customers and communities.

We monitor energy availability and costs to help anticipate how changing climate patterns, such as increasing temperatures, could affect our future energy-sourcing costs and activities.

We also assess the transitional climate risks due to legislation regarding refrigerant use and the transition to lower-GWP refrigerants. As a result of state and federal requirements regarding the phasedown of hydrofluorocarbon (HFC) refrigerants, we anticipate steadily replacing refrigerant infrastructure across our store portfolio to reach required levels, which could incur additional costs.

Kroger continues to monitor this evolving topic and engage subject matter experts and others to understand what is most important to our customers, communities and shareholders.



We are moving toward more circular systems in our operations and in *Our Brands* product packaging to reduce the impact of waste on our planet. We focus on waste reduction, reuse and recycling opportunities to advance progress on our goals.

Our Approach

Leaders across our lines of business work collaboratively to reduce waste company-wide. Guided by our strategic approach to waste reduction and diversion, each supermarket division has an Expense, Sanitation and Sustainability Manager who implements programs with oversight from a centralized Retail Operations team. These division managers oversee waste diversion efforts, including operational waste recycling and food waste recycling.

Retail store managers support the everyday execution of these programs to make sure we are making progress on our goals. Similarly, our Supply Chain team has sustainability leads who help guide waste reduction and waste recovery initiatives in these facilities.

We express our ambition through Kroger's Zero Hunger | Zero Waste impact plan, aiming to achieve a 90%+ waste diversion rate across the company. We expect to continue increasing waste diversion from landfills through enhanced collaboration across our facilities, convenient food waste recycling programs and the expanding role of reusable plastic containers.

In 2024, our company-wide waste diversion rate improved to 85%, up from 82% a year ago. Total waste generated increased (regardless of destination); however, the amount of waste sent to landfills and waste-to-energy processing decreased as recycling and data quality improved.

The total volume of food waste diverted from landfills improved by 17% in 2024. We saw year-over-year variation in waste volumes sent to different food waste recycling outlets, reflecting the expanding role of anaerobic digestion (AD) programs in our stores. Total annual food and non-food donations increased. In-store pharmacy teams piloted solutions to recycle stock pill bottles during 2024 and continue to expand this program to more locations in 2025.

We continue to expand the use of reusable plastic containers (RPCs)—used to distribute produce, eggs, milk, meat and bread—to more functions and facilities to reduce the amount of waste generated. Since 2024, we grew the use of produce RPCs by more than half, and expect to double their use by the end of 2026.

To enhance responsible disposal practices, our Environmental Compliance team oversees processes for our stores to properly manage unsalable products, store-use chemicals and other products that have reached the end of their useful life. Licensed hazardous waste vendors collect materials from our sites for appropriate disposal, reuse, recycling or destruction in full compliance with applicable regulations.

Company-Wide Waste Diversion-from-Landfill Rate

2022	82%
2023	82%
2024	85%

Engaging Our Associates

Kroger's associates help achieve our Zero Hunger | Zero Waste mission by implementing store and supply chain facility programs every day to reduce waste.

Our Zero Hunger | Zero Waste retail store certification program is designed to engage more associates through our training platform and connect everyday work to Our Purpose and impact plan. The six training modules include: general markdowns, produce markdowns, Food Rescue (surplus food donations), food waste recycling, plastic film recycling and cardboard recycling programs. New associates are expected to complete all six training modules listed above to become certified.

In 2025, we introduced an advanced version of this certification with new department-specific training modules for all store leaders and departments. We also recognized retail divisions for top performance in food donations and food waste recycling programs, as well as stores achieving 90%+ diversion from landfill.

We use "always-on" information-sharing tools with our associates to improve program execution, including more centralized and comprehensive metrics dashboards.



2.7M

Material Topics
WASTE & CIRCULARITY

FOOD WASTE

pieces of *Our Brands* plastic packaging our customers sent to TerraCycle® for recycling since 2021



52%

percentage of *Our Brands* product packaging that is recyclable, reusable or compostable

2,213stores with food waste de-packaging programs by end of 2025

2024 performance—short tons

	2023 Weight (short tons)	2024 Weight (short tons)	2023 to 2024 Year- Over-Year Change (%)
Reuse (RPCs) ²	347,634	419,769	+21%
Donations ³	61,983	63,770	+3%
Animal feed	62,418	56,164	-10%
Anaerobic digestion (AD) ⁴	118,138	151,875	+29%
Composting	102,415	122,986	+20%
Baled cardboard	749,722	781,120	+4%
Baled plastic	29,215	44,659	+53%
Wood & pallets	738,876	926,034	+25%
Other recycling ⁵	219,705	283,041	+29%
Waste to energy ⁶	5,254	7,921	+51%
Landfill	526,978	490,867	-7%
Total waste (excluding reuse)	2,614,703	2,928,437	+12.0%
Total waste footprint (including reuse)	2,962,337	3,348,206	+13.0%
Diversion	82.0%	85.1%	+3.8%

Managing Food Waste

Keeping food waste out of landfills is a key part of Kroger's Zero Hunger | Zero Waste impact plan. Our current ambition focuses on two main areas for improvements through 2025:

- Reducing the total amount of food waste generated in our stores by 50% (2017 baseline)
- Improving how we manage remaining food waste by diverting 95% or more from landfills

We do this by selling through as much food as we can, safely donating eligible food that can no longer be sold, and increasing the amount of remaining unsold food directed to food waste recycling programs to ensure as little food as possible ends up in landfills, where it produces GHG emissions.

Food Waste Reduction

To prevent fresh food from being wasted in the first place, we aim to sell as much as possible in our stores. Established markdown programs in all fresh departments make items more affordable and encourage faster sale. Our produce markdown (redbag) program, through which we discount and sell imperfect produce, is a customer favorite. Kroger also developed automated and dynamic markdown systems for more consistent program execution.

Every day, our associates rescue remaining surplus fresh food to feed people in our communities. Kroger donates eligible fresh, safe food to hunger relief organizations in our local communities. In 2024, we donated 119 million pounds of surplus food to Feeding America's network of food banks and agency partners through our Zero Hunger | Zero Waste Food Rescue program.

Improving Diversion

We aim to divert remaining unsold food that cannot be donated to our communities through a combination of animal feed programs, composting, AD and biodiesel generation, each with their own benefits for Kroger and the environment.

In 2024, we operated food waste recycling programs in 97% of our stores, achieving our goal of 95% store participation two years ahead of schedule. In 2024, we launched food waste recycling programs in more than 100 retail stores.

Kroger also introduced a new AD recovery program in a significant number of stores last year. Our primary AD program provider, Divert, Inc., offers innovative de-packaging technology that eliminates the need to remove food from packaging on-site before recycling, simplifying the process for our store associates and making it easier to recycle store food waste in day-to-day operations.

By the end of 2024, this Divert de-packaging solution was in place at 1,324 Kroger-operated stores. In 2025, we are expanding the program to include more than 400 additional stores.

As a result of increased access to these recycling programs and improved store execution and data quality, Kroger increased the total amount of food waste recycled by 17% in 2024.

^{1.} Data reflects calendar year with the exception of construction waste, which reflects fiscal year. Waste is managed and reported to Kroger by our different waste and recycling haulers. Waste data excludes office locations and salvage centers, which represent very small proportions of our waste footprint. Table may not sum due to rounding

^{2.} Total waste generated excludes the reuse of reusable plastic containers (RPCs) in our supply chain network, though we do include these in our waste diversion calculation

^{3.} Donation data primarily reflects food donations, with a small amount of non-food donations

^{4.} AD weights increased significantly in 2024 as Kroger expanded the use of AD programs and de-packaging solutions in our stores

^{5.} Construction project waste and recycling data excludes minor capital projects

^{6.} In the 2023 data, some volume classified as waste-to-energy in previous years was found to be going to AD (a by-product of which is fuel that is used to generate energy on-site). A small portion of the volume ended up going to compost and animal feed

We calculate our food waste footprint annually to track progress on our waste reduction and recycling goals. Working with WWF, Kroger established a food waste measurement methodology using the World Resources Institute's (WRI) Food Loss & Waste Protocol.

In 2024, we improved the percentage of in-store food waste diverted from landfills from 52% to 58%, largely due to expanding recycling and de-packaging programs. By diverting 186,090 tons of retail food waste from landfills in 2024, we avoided an estimated 130,076 tons of CO_2e emissions.

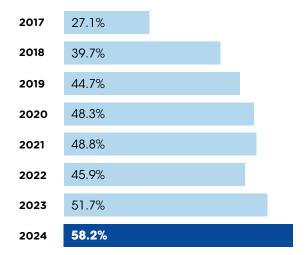
The total amount of food waste generated in our stores (regardless of final destination) in 2024 increased by 20.3% compared to the prior year, from 265,773 tons to 319,720 tons. We aim to reduce the amount of food waste we produce by right-sizing our assortment, optimizing inventory management, improving dynamic markdown solutions and expanding items eligible for donation. The increase in food waste generated last year reflects changes in customer-focused programs, including moving our fresh cut fruit program to in-store versus third-party production; continuous changes in assortment and sales; and improvements to the data and assumptions informing our food waste calculation.

Ultimately, our goal is to reduce the amount of food waste generated and to recycle as much of the remaining waste as possible. Despite the short-term increase in waste generated, our long-term trends remain positive. Since 2017, we have decreased the amount of food waste generated in our stores by 4% and improved our diversion rate from 27% to 58%.

Kroger is a member of the Pacific Coast Food Waste Commitment and the U.S. Food Waste Pact. These engagements provide pre-competitive forums where members can share best practices, collaborate crossfunctionally across the value chain and gain insight from industry experts to support our collective goals.

Increased Food Waste Diversion Over Time^{1, 2}

Percentage



Change in Total Food Waste Generated Over Time^{1, 2, 3}

2017	332,212
2018	301,282
2019	288,966
2020	268,248
2021	269,382
2022	245,289
2023	265,773
2024	210 720

Food Waste Management Data

2024 Performance—short tons

Destination ⁴	Food	Inedible Parts	Total
Animal feed	28,273	9,005	37,278
Anaerobic digestion	111,578	-	111,578
Composting	27,399	-	27,399
Biodiesel production	-	9,835	9,835
Landfill ⁵	133,630	-	133,630
Total	300,881	18,839	319,720

- Data reflects calendar yea
- 2. Harris Teeter data is included in landfill and food diversion data but is not included in inedible parts diversion data due to insufficient data
- 3. The increase in food waste generated last year is due to programs like moving our fresh cut fruit program to in-store versus third-party production, continuous changes in assortment, and improvements to the data and assumptions informing our food waste calculation
- 4. Food waste diversion data reflects data collected from stores on composting, animal feed, AD, fat/bone and used cooking oil recycling programs
- 5. The landfill metric shared here is estimated using data captured and synthesized from annual waste audits conducted in a subset of our stores



Product packaging is designed with multiple purposes in mind, from protecting food safety, quality and freshness to communicating product information to customers. While balancing these important priorities, Kroger aims to improve the sustainability of *Our Brands* packaging over time by reducing unnecessary packaging, using more recycled materials and increasing recyclability.

Several years ago, Kroger introduced *Our Brands*<u>Sustainable Packaging Goals</u> for 2030 that inform our approach to packaging design across the *Our Brands* portfolio. This work includes:

- Completing a baseline product packaging footprint to fully understand current packaging impacts
- Seeking to achieve 100% recyclable, compostable and/or reusable *Our Brands* packaging
- Increasing recycled content in packaging so that the portfolio of packaging collectively contains at least 10% post-consumer recycled (PCR) content
- Increasing awareness among Kroger customers about how to manage Our Brands product packaging at end of life
- Reducing unnecessary packaging

Progress to Date

Over time, we are refining the *Our Brands* packaging dataset to reflect changes in the product assortment, capture packaging changes and replace estimated data points with updated supplier-provided information.¹

We are working to improve the processes for capturing packaging data as we continually change the *Our Brands* product portfolio and update information regarding packaging recyclability. This is particularly relevant given expanding packaging legislation in several states in which we operate.

Moving forward, we plan to update our packaging footprint every other year to enable more time to implement product packaging changes between reporting cycles. The data presented below reflects previously reported 2023 performance. We will share the next packaging update in 2026 to report progress achieved during 2025.

As previously reported, we achieved the following progress to date:

- 52% of Our Brands packaging met goal definitions for recyclability, reusability or compostability. We measured this by assigning a recyclability score to each packaging component and calculating the weighted total that reflects component weight and product sales during the reporting year. The improving quality of our data, combined with a dynamic product assortment, led to an increase in our recyclability findings in 2023 over the prior year.
- The in-scope Our Brands product portfolio contained 10% PCR. To be conservative, we only use PCR content reported by suppliers, not any of our proxy data, in the numerator of this calculation. We are focused on adding PCR across our packaging portfolio, particularly in the Our Brands products that we manufacture.

Packaging Recyclability

Kroger's framework for defining recyclability reflects best practice definitions and requirements of the Ellen MacArthur Foundation and the How2Recycle program. In this framework, we included the top two levels in our definition of recyclable for *Our Brands* packaging. We aim for packaging to be widely collected for recycling or optimally recycled in practice and at scale.

As legislation defines packaging recyclability in an increasing number of states, we will update our definitions and calculations to reflect compliance and reporting requirements. This changing landscape is also affecting how we prioritize necessary packaging changes and what we request from our suppliers in terms of innovation, materials changes or format redesigns. Multiple teams within Kroger—packaging engineers, sourcing experts and *Our Brands* product managers—guide the review and improvement of packaging to meet legislated requirements and our goals.

We are contributing to the development of better processing and new markets for recycled materials. Through funding from the Zero Hunger | Zero Waste Foundation, we are a Recycling Coalition Supporter of The Recycling Partnership. The foundation continues to support the multi-stakeholder Polypropylene (PP) Recycling Coalition and the Polyethylene Terephthalate (PET) Recycling Coalition to improve community-level infrastructure for curbside PP collection and recycling and improve recycling outcomes for PET thermoform packaging.

Recycled Content Materials

Kroger teams are focused on how they can increase PCR in our product packaging to align with our own goals and expanding legislative requirements to achieve higher percentages. We continue to evaluate opportunities for using PCR in plastic packaging, implementing it where feasible. Factors like high demand, increasing costs, performance considerations like shelf life and coloration, and process changes to accommodate PCR materials make this challenging.

Convenient Recycling Opportunities

Our in-store plastic film collection and recycling program accepts monolayer plastic films that are not currently accepted in curbside recycling programs. This includes non-food items like plastic grocery bags; plastic overwrap on household tissues, diapers and bottled water; dry cleaning bags; retail produce bags; and packaging that is labeled as acceptable for instore drop-off programs.

Working with TerraCycle, we continue to offer the Kroger Our Brands Free Recycling Program, introduced in 2021 as the first program of its kind for a U.S. retailer. Participating Kroger customers can mail in flexible plastic packaging from their favorite Our Brands products for free recycling. The collected plastic packaging is transformed into useful products like playgrounds for local communities or lunch boxes. Participants earn TerraCycle points for every pound of waste they send in for recycling, which can be redeemed as a donation to a charity of their choice.

Through 2024, our customers have returned more than 2.7 million pieces of *Our Brands* flexible packaging—the equivalent of more than 58,000 pounds of plastic—making us one of the leading TerraCycle partners in North America.

Our dataset primarily includes food products, both grocery and fresh, as well as health, beauty, household supplies and cleaning, while excluding general merchandise products (apparel and home goods), Home Chef*, Vitacost and national brand products

Packaging Recyclability Definitions and Progress¹

Recyclability Level	Brief Description	Example Packaging Types	% of Kroger Packaging²
Recycled in practice and at scale	The component is recyclable and either remaining components are compatible with the recycling process or non-recyclable components can be separated. The packaging type must achieve a 30% post-consumer recycling rate in multiple regions.	Glass beverage containers; cardboard, paperboard; aluminum beverage cans, pans, trays	14%
Widely collected for recycling	A majority percentage of the population (at least 60%) has access to a recycling collection system that accepts the packaging (curbside or special take-back schemes). There are occasions when packaging is collected through a recycling system but not recycled.	Plastic bottles, jugs, jars (PET, ³ HDPE, ⁴ LDPE ⁵); PP ⁶ cups; aluminum food cans; glass containers	38%
Sometimes collected for recycling	A significant percentage (20%-59%) of the population has access to a curbside recycling collection system that accepts the packaging. There are occasions when packaging is collected through a recycling system but not recycled.	PET clamshells, tubs, trays; LDPE containers; aluminum trays, aerosol containers	1%
Recycle ready	Packaging is designed for collection, sorting and recycling using end-of-life processes, but collection, sorting and recycling infrastructure is not yet widely available.	Monolayer PE ⁷ plastic film	2%
Not recyclable	Packaging is unable to be sorted, reprocessed and provide value for end markets without significant challenges. Though it might be technically possible to recycle a packaging item, there are systemic barriers to the collection, sorting and recycling in practice, at scale and with reasonable economics.	Multilayer plastic film; problematic materials (e.g., PS, ⁸ PVC, ⁹ PFAS ¹⁰)	45%

Packaging Legislation

Appendix

Like many other brands, Our Brands products are subject to a number of different packaging legislation requirements in the states in which we operate, such as extended producer responsibility (EPR), recyclability requirements, minimum requirements for PCR and restrictions on packaging claims.

Kroger's multi-functional team of subject matter experts continues to monitor these expanding requirements, engage with industry groups and implementation organizations, prepare reporting materials and develop implementation plans where necessary.

Single-Use Plastic Bags

Our customers have a wide range of views on many sustainability-related topics, including single-use plastic bags. Some customers have already switched to reusable or paper bags to reduce their own waste. and others still rely on free single-use plastic bags for convenience and affordability when they shop.

There are trade-offs to consider with every option, from the environmental impacts of producing, transporting, using and ultimately disposing of different types of bags, to the costs of purchasing and managing each type for the business and our customers. We believe legislation can be an effective way to level the playing field, encourage new consumer habits in a timely fashion and reduce plastic bag waste in nature.

As described in our progress update, going forward, we will focus on achieving a continual reduction in single-use plastic shopping bags provided in our stores over time.

Kroger also participates in the Consortium to Reinvent the Retail Bag, an industry collaboration to reduce single-use bag waste, managed by Closed Loop Partners' Center for the Circular Economy. In 2024, Phase 2 of the consortium launched with Kroger's participation at the "Strategic Partner" level.

After consumer tests in Denver and Tucson in 2023, the consortium launched a "Break Up With the Single-Use Bag" campaign in Southern California in 2025. Our Ralphs and Food 4 Less stores are participating in the campaign to test in-store and local communications and prepare for state legislation banning all plastic bags in 2026. The consortium also released this policy white paper analyzing single-use bag legislation in the U.S.

As always, we invite our customers to return their dry, clean single-use plastic shopping bags and other plastic films such as dry cleaning and bread bags, overwrap packaging for diapers, water bottles and more through our in-store recycling programs.



^{1.} Performance shown here reflects 2023 data, as we did not recalculate progress on goals for 2024

^{2.} Totals may not sum due to rounding

^{3.} PET: Polyethylene terephthalate

^{4.} HDPE: High-density polyethylene

^{5.} LDPE: Low-density polyethylene

^{6.} PP: Polypropylene

^{7.} PE: Polyethylene

^{8.} PS: Polystyrene

^{9.} PVC: Polyvinyl chloride

^{10.} PFAS: Per- and polyfluoroalkyl substances

Biodiversity & Resource Conservation

Kroger relies on natural resources to operate our business and bring a wide range of products from around the world to our customers. Our goals to protect biodiversity, improve agricultural practices and conserve water reflect our ambition to work with suppliers to ensure these resources are available far into the future.

Our Approach

Kroger's Zero Hunger | Zero Waste impact plan and other public goals—including emissions reduction, no-deforestation, seafood sustainability, pollinator protection and dairy stewardship goals—support a wide range of positive changes in our supply chain.

Leaders in Merchandising, Sourcing and Communications & Public Affairs work together to manage key product categories that may pose higher risk and where we identify opportunities for change. Kroger's senior leadership team and Public Responsibilities Committee of the Board provide additional direction and oversight.

Kroger continues to monitor emerging naturebased frameworks for sustainability, including those designed for target-setting and disclosure, so we can evaluate the potential impact to Kroger of new guidelines and expectations on this complex topic. We also engage our suppliers for insights and feedback when setting expectations in key categories.

An ongoing biodiversity risk assessment conducted in tandem with a refreshed climate risk assessment-now including select commodities from our supply chain will help Kroger better understand the types and magnitudes of risks in our commodity supply chains.

Supply Chain Sustainability

As a leading manufacturer, retailer and distributor of food products and other essentials, we believe it is important for our business to maintain healthy natural ecosystems that sustain our supply chain and support our global food system.

Agricultural Practices

Encouraging our suppliers to adopt more sustainable agricultural practices in ways that work for their business is an important part of our approach. We believe collaboration with our vendors, suppliers and the broader value chain is critical for achieving meaningful changes over time and building a more resilient food system for the future.

As a dairy processor, Kroger is a signatory of the U.S. Dairy Stewardship Commitment, which seeks to monitor and reduce the environmental impacts of the dairy industry. We are also members of Field to Market: The Alliance for Sustainable Agriculture, which develops science-driven and outcomes-based programs and tools for industry collaboration.

Integrated Pest Management Practices

In 2024, we shared Kroger's Goal to Protect Pollinators & Biodiversity, which requires fresh produce suppliers to implement Integrated Pest Management (IPM) practices for all products supplied to Kroger. We expect mediumto large-sized suppliers to meet this requirement by the end of 2028, with smaller suppliers to follow by 2030.

We worked with Sustainable Food Group, a branch of the IPM Institute of North America, to develop this goal. We surveyed a sample of suppliers—representing about 40% of Kroger's fresh produce spend—on topics like pest management, soil health, biodiversity and water conservation. From this survey, we also learned that suppliers would appreciate efforts to streamline produce growing requirements across retailers and other food buyers, if it could be done in a pre-competitive manner.

Kroger is developing our approach for implementing this goal for the coming years. We believe engaging our suppliers, carefully reviewing certifications and making informed sourcing decisions will advance progress toward our goal and reduce supply chain impacts on pollinators.

Material Topics

BIODIVERSITY & CONSERVATION AGRICULTURAL PRACTICES WATER



\$1.45M contributed to Community Development Funds from Kroger's Fair Trade Certified purchases in 2024

38 fishery improvement projects supported in 2024

natural and organic items in the average Kroger-operated store



Governance

Organic Growing Practices

We offer our customers a wide assortment of organic products spanning our fresh and grocery departments. Organic agricultural practices can help reduce environmental impacts to pollinators and the ecosystems where products are grown. The average Kroger store contains more than 5,000 natural and organic products, with all stores carrying some assortment. Several of Kroger's food production plants produce certified organic products, as do our thirdparty and national brand vendors.

No-Deforestation Goal

To address the risk of tropical deforestation in our supply chain, we developed Kroger's No-Deforestation Commitment: Our Brands, which aims to minimize deforestation in key at-risk commodities, including palm oil, beef, soy and paper. We query our suppliers annually to assess alignment with our goal.

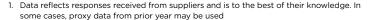
For products that contain palm oil or paper, we require our suppliers to align with well-established certification frameworks to demonstrate the management of deforestation-related impacts. Because beef and soy commodities lack widely established certification frameworks, we use a geographic risk-based approach. We also ask our suppliers for information about their nodeforestation practices.

Because our global supply chain is highly complex, we don't always have full visibility into the land-based impacts of the products we source. Increased supply chain visibility is important for achieving our goals, and we believe that by requesting deforestationrelated information from our suppliers on a regular basis, we can continue improving transparency in our commodity supply chains where there are deforestation risks.

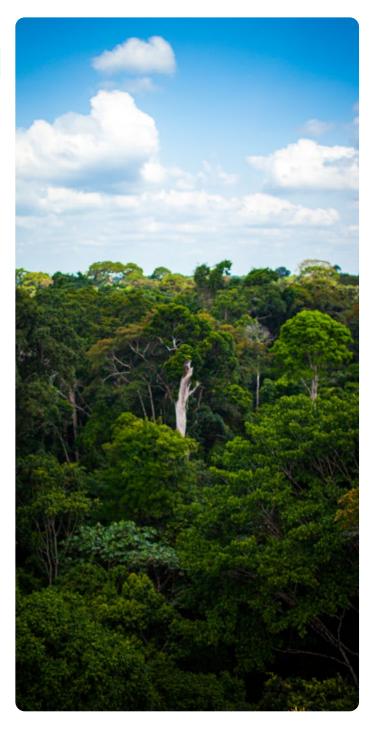
We provide an overview of commodity-specific progress in the adjacent table.

No-Deforestation Goal Progress

Commodity	Goal(s)	Progress Update ¹			
Palm oil	 Maintain our existing goal, set in 2015, to source palm oil, palm kernel oil and palm oil derivatives 	 94% of palm oil-based ingredients, by volume, were certified 91% were certified to the Mass Balance supply chair standard or higher 			
	in <i>Our Brands</i> products from sources certified to the Roundtable on Sustainable Palm Oil (RSPO) supply chain standard, or equivalent, with a preference for sourcing physical palm oil certified to an RSPO Mass Balance standard or higher				
Beef ²	 Source beef in our fresh meat case and beef-based ingredients used in our manufacturing plants from sources that are deforestation-free by 2025 Achieve the same goal for all <i>Our Brands</i> 	 97.6% of beef-based ingredients in our fresh meat case and manufacturing plants, by volume, were harvested in regions with low- or no-deforestation risk. In addition, 93.6% were from cattle born, rais and harvested in low- or no-deforestation risk reg 			
	products by 2030	 Moving forward, Kroger will report progress on our no-deforestation goal for beef-based ingredients in Kroger third-party-manufactured Our Brands products every other year 			
Soy ²	 Source soy-based ingredients used in our manufacturing plants from sources that are deforestation-free by 2025 	 99.9% of soy-based ingredients sourced into our plants, by volume, were from low- or no-deforestat risk regions 			
	 Achieve the same goal for all Our Brands products by 2030 	 Moving forward, Kroger will report progress on our no-deforestation goal for soy-based ingredients in Kroger third-party-manufactured Our Brands products every other year 			
Paper	 Source virgin fiber used in product packaging in our manufacturing plants certified to the FSC,³ 	94.2% of paper, by volume, in manufacturing plants was certified and/or contained recycled content			
	SFI ⁴ and/or PEFC ⁵ standards, with preference for the FSC standard, by 2025	 Moving forward, Kroger will report progress on our no-deforestation goal for Our Brands household 			
	 Achieve the same goal for all Our Brands products, including paper product packaging and household paper products 	paper and paper-based packaging every other yea			



^{2.} We use the geographic deforestation risk in the CDP Forests questionnaire guidance to determine if the beef and soy ingredients in our beef counter, plants and Kroger-labeled products are at risk for deforestation. CDP uses the definition of "tree cover loss"



^{3.} Forest Stewardship Council

^{4.} Sustainable Forestry Initiative

^{5.} Programme for the Endorsement of Forest Certification

Kroger has a long-standing focus on improving seafood sustainability in collaboration with WWF. Together, we monitor progress in sourcing regions and contribute to industry efforts to improve fishery practices and protect aquatic ecosystems.

Our <u>Seafood Sustainability Policy</u> articulates our commitments and supplier expectations. In 2024, we sourced 97% of wild-caught seafood and 99% of farm-raised seafood in our Seafood department in alignment with our policy.

We rely on certifications to verify that facilities, fisheries and farms in our supply chain are operating responsibly and sustainably. These organizations occasionally lose their certifications, which may affect performance on our goals until the source fishery or aquaculture farm improves, or until we can move to a more sustainable or certified source. As a result, we aim to maintain at least 95% alignment with the wild-caught and farm-raised certifications specified in our seafood policy.

In 2024, we continued supporting fishery improvement projects (FIPs) to help fisheries achieve Marine Stewardship Council (MSC) certification. This year, Kroger's seafood sourcing included wild-caught seafood from 38 comprehensive FIPs.

In 2024, 98% of our shelf-stable tuna, by volume, was from suppliers aligned with our requirement that tuna suppliers¹ be in good standing with the International Seafood Sustainability Foundation (ISSF).

We also aim to source 20% of shelf-stable *Our Brands* tuna from MSC-certified fisheries by 2025. In 2024, 24% of relevant volume came from MSC-certified sources, an increase of nearly 17 points from 2023 progress, due to a continued emphasis on procuring certified products.

We will continue working with WWF and our seafood suppliers to improve the transparency and traceability of seafood globally. This is particularly important for Kroger as we seek to meet the U.S. Food and Drug Administration's (FDA) traceability requirements for seafood under the Food Safety Modernization Act.

For more details, please see the <u>WWF-Kroger Seafood</u> Sustainability Report.

Wild-Caught Seafood Meeting Kroger's Seafood Sustainability Policy

2022	95%
2023	96%
2024	97%

Farm-Raised Seafood Meeting Kroger's Seafood Sustainability Policy

2024	99%
2023	98%
2022	99%

Fair Trade Certified Products

We offer nearly 100 Fair Trade Certified *Our Brands* products spanning a variety of commodity categories. In 2024, we sourced 26.48 million pounds of certified ingredients for our products, an increase of 2% from the prior year. The Fair Trade Certified label is backed by more than 120 social, environmental and economic protections, with benefits for both the people making our products and our planet.

Fair Trade standards and guidelines foster sustainable production practices that preserve the environment, enhance climate resilience, and support the health and quality of life of producers and their communities.

A portion of every Fair Trade purchase goes to Community Development Funds for initiatives identified by workers and their communities to meet their most pressing needs. This means communities can make critical investments to improve infrastructure and provide basic resources like education, sanitation and clean drinking water. Kroger's total Fair Trade Certified purchases contributed \$1.45 million in Community Development Funds in 2024.

As part of the Sustainable Coffee Challenge, Kroger aims to continue sustainably sourcing coffee products from international growing regions for our Simple Truth® and Private Selection® brands. In 2024, 100% of Simple Truth® and 89% of Private Selection® coffee products met our commitment.

Fair Trade Certified Ingredients Used²

Pounds

2022 23.31M **2023** 25.97M

2024 26.48M



- 1. Both Our Brands and national brands
- 2. 2022 and 2023 values are restated due to a correction in the source data. Data includes finished goods, but excludes fresh products

Kroger's *Our Brands* and national brand suppliers have developed a large variety of plant-based products as alternatives to traditional animal-based proteins and ingredients. These items can reduce the carbon emissions and other environmental impacts of animal-based products and may also provide health benefits.

In 2024, Kroger offered about 115 plant-based *Our Brands* items, primarily in the Simple Truth® brand. These products span 35 Kroger merchandising categories, including deli, bakery, dairy, meat, snacks and frozen. Total sales of *Our Brands* plant-based items decreased by 13% between 2023 and 2024, primarily due to shifting demands and customer preferences.

As with our entire assortment, we continue to adjust our plant-based offerings to meet our customers' needs in this evolving space. Sales of the most popular plant-based items remain strong, including alternative milks and tofu.

In recent years, Kroger developed and promoted a campaign to highlight plant-based items across the store, featuring top national brands and Simple Truth® items. This *Power of Plant Based* campaign used special promotions to drive attention to and increase customer engagement with these products.

As part of the outreach to encourage customers to try plant-based items, many brands have participated in an annual food truck event presented in multiple Kroger geographies, featuring free samples and coupons for participating items.



Water

Safe, high-quality and abundant water is critical for the health of our associates, customers, communities and the planet. Across our facilities, we find ways to reduce water use in day-to-day operations to increase efficiency and protect natural resources.

Kroger's periodic water risk assessments for our facilities have assessed location-based water risk across several impact areas, including physical quantity, physical quality, and regulatory and reputational risks. In our last assessment, some of our facilities were in regions with a defined level of water stress; collectively, these facilities accounted for less than 10% of our total facilities.

Kroger has retrofitted our retail stores to adopt a water efficiency plan that includes multiple parts of the store, both inside and out. As a result, we are seeing additional water savings and efficiency with the help of approximately 200 adiabatic condensers (or coolers). These condensers use water for cooling only when needed, with an estimated annual saving of 1,000 kGal per site.

Several of our manufacturing plants use significant amounts of water in their production processes. Over time, our plant engineers have found ways to reduce and reuse water in their operations. We use on-site wastewater treatment at certain plants, including our K.B. Specialty Foods plant in Greensburg, IN, where AD technology converts wastewater to renewable biogas and electricity that is used to power the facility.

In 2024, company-wide water consumption decreased by 1.3%. This is partly driven by ongoing improvements in data quality as we move from estimated to actual sources.¹

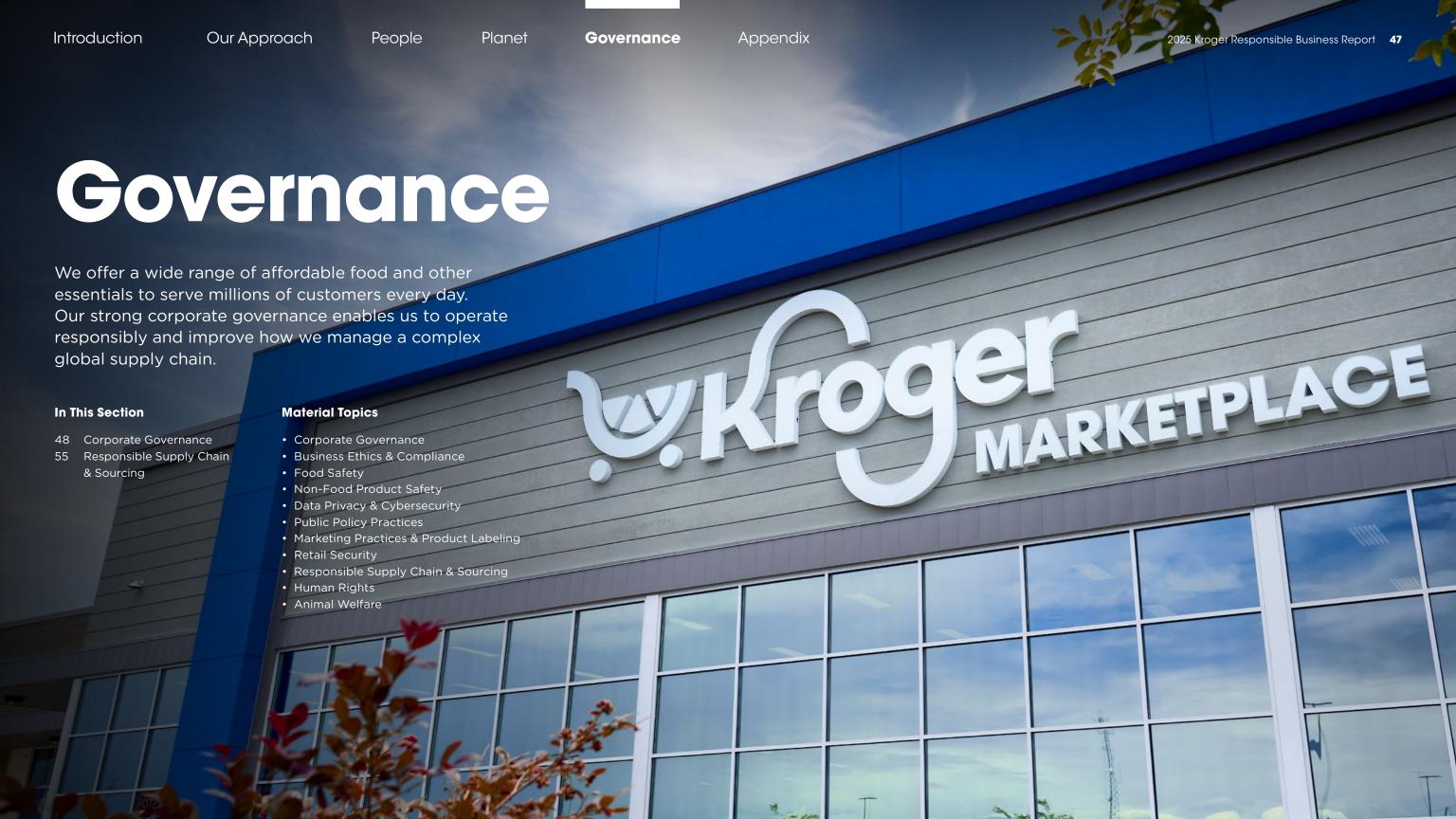
We continue to monitor and evaluate progress over time on water use and management across our operations.

Water Footprint²

Billion gallons

2022	5.69	
2023	5.91	
2024	5.84	

- Because water consumption is not metered in all stores, we use a detailed estimation process to fill in missing data points, including using proxy data from the previous year and per-square-foot intensity metrics. We also refine the portfolio of sites included in our water inventory based on store closures, site openings and updated information about locations
- 2. Water data reflects calendar year results and all Kroger operations



Corporate Governance

Kroger's operations and supply chain include communities near and far. We engage leaders in our strategy and hold teams accountable for results. We are making progress on our journey to integrate ownership for material topics within and across our business. Our centralized structure, vertical integration and focus on responsible sourcing also enable our forward progress.

Our Approach

Kroger has a history of strong corporate governance, including oversight of material topics affecting people and our planet. Our Law Department oversees matters of corporate governance with oversight from the Board of Directors. We manage key topics in the context of our business priorities and strategies, balancing the long-term interests of our associates, customers, communities and other stakeholders.

Our approach to managing Responsible Business topics is informed by a comprehensive, third-partyled materiality assessment aligned with the principles of double materiality and best practices for defining and prioritizing material topics. Insights from this materiality assessment inform our approach to engaging associates, customers, communities and other stakeholders and how we report progress.

We integrate topic management and goals into our business and corporate governance practices, including oversight and accountability for enterprise risk among senior leadership and the Board. Five Board committees have oversight of Responsible Business topics, as outlined on the next page.

Details of our Board members' areas of expertise, as well as committee composition, are available online in Kroger's 2025 Proxy Statement and 2024 Annual Report.

Several Kroger departments support our work, including:

- Associate Experience & Labor Relations: Leads human capital management, including hiring, compensation and benefits; leads diversity and inclusion initiatives; engages with labor unions to negotiate collective bargaining agreements
- Audit: Oversees financial reporting and manages independent auditors
- Communications & Public Affairs: Leads the Responsible Business strategy, including sustainability and social responsibility, and communications and public affairs, including government relations, advocacy and philanthropy
- Corporate Food Technology: Oversees food, health and beauty care product safety and quality assurance; manages recalls affecting Kroger-manufactured and -labeled products and national brands; leads animal welfare program

- Ethics & Compliance: Leads awareness and implementation of corporate policies, including Kroger's Policy on Business Ethics, Anti-Corruption Policy, Vendor Code of Conduct and Privacy Policy; oversees compliance with relevant laws and regulations, including environmental requirements
- Merchandising & Marketing: Determines category assortment and promotional strategies; leads Our Brands strategy and assortment; leads supplier engagement together with Sourcing; leads customer engagement, loyalty and rewards
- Retail Operations: Guides standards, policies and program implementation for retail stores; advances operational performance on topics like food access, food waste and operational waste diversion
- Sourcing: Sources raw materials and finished products for Our Brands; purchases national brand items for resale and goods not for resale; leads Responsible Sourcing program; leads supplier engagement with Merchandising
- Supply Chain: Manages our manufacturing operations, distribution network and transportation fleet
- Technology & Digital: Focuses on governance, innovation and digital channels; manages approach to privacy and cybersecurity

Material Topics

CORPORATE GOVERNANCE **BUSINESS ETHICS & COMPLIANCE FOOD SAFETY** NON-FOOD PRODUCT SAFETY **DATA PRIVACY & CYBERSECURITY** PUBLIC POLICY PRACTICES MARKETING PRACTICES & PRODUCT LABELING RETAIL SECURITY



Oversight of Responsible Business Topics

Board of Directors: Committee Oversight

Audit Committee

Data Privacy & Cybersecurity **Ethics** Financial Integrity Legal & Regulatory

Operational & Third-Party

Compliance

Compensation & Talent Development Committee

Associate Experience Diversity & Inclusion **Executive Compensation Labor Relations** Talent Development

Corporate Governance Committee

Board Recruitment Board Succession Independent Director Compensation Shareholder Advisory Votes &

Shareholder Proposals Shareholder Engagement Program

Finance Committee

Appendix

Capital spending to ensure consistency with Responsible Business strategy & goals

Public Responsibilities Committee

Advocacy & Public Policy Communications & Brand Stewardship Responsible Sourcing Safety

> Social Responsibility Stakeholder Relations Sustainability



Senior Leadership Team

Data Governance Committee

Diversity & Inclusion Advisory Council

Enterprise Risk Management

Responsible Business Team

Ethics & Compliance



Cross-Functional Topic Management

Food Access Climate Impact **Packaging**

Waste & Circularity

Responsible Sourcing

Business Ethics & Compliance

We strive to uphold the highest ethical standards and help our associates, suppliers and vendors do the same. We consistently review company policies and update them as appropriate to advance ethical and responsible practices.

Our Ethics & Compliance team is responsible for driving internal implementation of Kroger's Policy on Business Ethics and related policies and monitoring our company helpline, through which associates can anonymously report concerns. Together with Communications & Public Affairs and Sourcing teams, the Ethics & Compliance team monitors legislative and regulatory changes, shares updates and develops compliance programs as needed.

Regulatory Compliance

Kroger is committed to product safety and quality. Our suppliers must comply with regulatory requirements pertaining to product safety and meet or exceed Kroger's quality, safety and performance requirements. A dedicated group maintains a General Merchandise Regulatory Compliance and Quality Assurance Program, which outlines product-testing requirements for Our Brands general merchandise.

To enhance responsible disposal practices, our Environmental Compliance team oversees processes for our stores to properly manage unsalable products, store-use chemicals and other products that have reached the end of their useful life. We leverage UL Solutions' WERCSmart platform to collect, validate and assess safety and disposal data for hazardous and non-hazardous products, ensuring our sites receive accurate guidance for compliant handling, storage and disposal. Licensed hazardous waste vendors collect materials from our sites for appropriate disposal, reuse, recycling or destruction in full compliance with applicable regulations.

We remain focused on product quality and safety, setting high standards for all *Our Brands* products. Our regulatory compliance and quality assurance programs define product and supplier requirements, such as quality specifications, testing protocols, and reporting and labeling, to ensure safe, high-quality products.

As reflected in our Safer Chemicals Statement, we proactively identify chemicals to remove from *Our Brands* products. Examples of recent progress include:

- 100% of *Our Brands* canned food items remained free of bisphenol A (BPA) liners in 2024
- 83% of Our Brands canned beverage items (by volume) did not contain BPA in the can liner. We will continue to expand this reach as supply becomes available
- Our Apparel Restricted Substances Policy, which includes a robust Restricted Substances List (RSL), establishes requirements about chemicals that are not permitted in *Our Brands* apparel products
- Kroger has evaluated the feasibility of implementing a restricted substance monitoring list, and while we will consider it periodically, we currently remain focused on offering *Our Brands* and national brand products aligned with our free-from lists



Food & Product Safety

Providing safe, quality food and products for our customers is Kroger's highest priority. Our Corporate Food Technology (CFT) team oversees safety, quality assurance and regulatory compliance for food and other products. For suppliers and others, these are conditions of doing business with us. We strive to meet and exceed high expectations for food safety, quality and freshness across our company.

Kroger's vice president of CFT and Regulatory Compliance leads a team of scientists and technologists who oversee food and product safety and quality assurance for our retail stores, food production facilities, warehouses and dedicated fulfillment centers. They monitor food integrity and purity, product size and specifications, and changes in legislation and regulations. The CFT team improves processes based on the latest best practices and guidance on allergens. Kroger's senior leadership team and Public Responsibilities Committee of the Board oversee food safety performance.

We follow a risk-based approach to managing food safety. We focus on preventing foodborne illness through a culture of continuous improvement and accountability. We train associates on food safety policies and process controls, conduct facility food safety audits, monitor performance, and conduct efficient product recalls and customer notifications.

Kroger is preparing to meet the updated compliance requirements for the FDA's Food Traceability Rule, which implements Section 204 of the Food Safety Modernization Act (FSMA). We support efforts to enable faster identification of recalled items to remove them from sale more efficiently. We also aim for continued improvements in data collection and traceability as foods move through our value chain.

Kroger is an active member of The Consumer Goods Forum and its Coalition of Action on Food Safety: the Global Food Safety Initiative (GFSI). Through GFSI, we are part of a community of 45 retailers and manufacturers that oversees food safety standards for businesses and collaborates to improve best practices.

Practices & Process Controls

The CFT team conducts frequent product testing to continually improve customer satisfaction. The team tests Kroger-manufactured items for safety and quality; conducts food safety audits at all facilities; reviews third-party audits of suppliers' facilities for compliance; works with regulatory agencies and suppliers to manage recalls affecting *Our Brands* and national brand products; and advises the Communications & Public Affairs team on recall communications, policy development and advocacy.

Every year, the CFT team updates cleaning protocols and master sanitation and cleaning schedules at all facilities, reflecting best practices. We have strict governance in place to ensure our own facilities and suppliers adhere to food safety requirements and process controls, including critical cold chain management guidelines. The team monitors Kroger's operational performance on food safety training, audits and inspections.

Grocery Stores

Across our stores, retail division food safety managers help ensure compliance with federal, state and local regulations through our risk prevention strategy, which focuses on:

- Associate training
- Food safety process controls
- Store sanitation
- Audits and food safety reviews

Food safety managers also participate in food safety organizations and industry groups to stay informed of new developments and share best practices. Kroger continues to train managers and associates working in store Fresh departments in food safety practices. In 2024, more than 3,100 store management and Fresh department associates were trained and nationally certified as Food Managers. We also trained more than 98% of store Fresh department new hires with food safety modules and daily reminders delivered through our *Fresh Start* associate training platform.

Kroger completed nearly 15,500 in-store food safety audits in 2024 and improved our year-over-year food safety violation per audit rate.

Manufacturing Facilities

All Kroger-operated food manufacturing facilities are certified to Safe Quality Food Institute standards, and every plant has an assigned Quality Assurance Manager and a Safe Quality Food Practitioner. We manufacture approximately 31% of total *Our Brands* units sold at our food processing plants across the country, using quality control plans from the ingredient level all the way to the finished product. The plans are adjusted according to various inputs, including customer comments.

Our manufacturing food safety risk mitigation strategy includes:

- Leadership and training
- Hazard analysis and risk-based preventive controls
- Sanitation control
- Food allergen control
- Environmental monitoring programs
- Audits and food safety reviews
- · Recall management

Kroger seeks to have our distribution and fulfillment centers that store food achieve GFSI standards for warehouse and distribution facilities by the end of 2025. To support this transition, a new Corporate Supply Chain Food Safety Manager oversees all food safety and regulatory programs in these facilities. In 2024, we conducted external audits for 38 warehouses that store and distribute food.

Distribution Centers

Management responsibilities are outlined in our food safety and sanitation standards, and associates implement formal documented programs, including site-specific Food Safety Plans. Kroger's distribution centers follow established cold chain management standards to help ensure temperature-sensitive products are managed properly in transit and storage. This is of particular importance during inbound and outbound transportation.

Key elements of these standards include:

- Food safety responsibility and documented practices
- Proper receipt and storage of materials
- Cleaning practices
- · Maintenance for food safety
- Pest prevention to avoid food adulteration

Fulfillment Centers

Our fleet of refrigerated Kroger Delivery trucks, which can store up to 20 orders, is designed to keep food safe and fresh for customers while being delivered to their doorstep. In addition to our warehouse food safety standards, we implement additional process controls to manage ambient, chilled and frozen products at our dedicated Kroger Delivery fulfillment centers. Powerful machine learning algorithms optimize delivery routes, considering factors such as road conditions and optimal fuel use to deliver food safely and efficiently.

Allergens

Kroger carefully manages federal requirements for food safety regarding allergens. Known allergens required on labels include peanuts, tree nuts, dairy, egg, wheat, fish, crustacean shellfish, soy and sesame.

Product Reformulations

We review Our Brands items regularly and reformulate products in ways that improve taste and quality for our customers. In 2025, we are preparing for additional product reformulations to comply with new federal guidance from the U.S. Department of Health and Human Services and FDA on timelines to phase out petroleum-based synthetic dyes from food products.

Non-Food Product Safety & Quality

Our Brands non-food products adhere to a multifaceted program to help ensure quality. We work with carefully selected suppliers that have been vetted and that adhere to compliance requirements as outlined in our centralized Supplier Hub, including third-party Good Manufacturing Practice (GMP) certifications.

All products undergo evaluation and standard setting during the development process. Product quality is designed into the process from the start through preliminary analytical testing, technical document review, product specification concurrence between Kroger and the supplier, and a first production review prior to release. After introducing the product to market, we continue to monitor and maintain quality. New products are tested by a third-party laboratory after six months in market, and we use a risk-based approach to conduct third-party testing for mature products.

We monitor and document customer feedback, which is also reviewed and addressed by our technical team and the relevant supplier for continual improvement.

Kroger's CFT and Regulatory Compliance teams also monitor regulatory activity over time related to product safety and ingredients to help ensure continued product safety and compliance. Information about product regulatory compliance is available in the Business Ethics Kroger-operated manufacturing facility. As in previous & Compliance section.

Recall Management

Products are removed from sale for many reasons, including incorrect package labels, undeclared allergens and, on rare occasions, the risk of illness or injury. Because our customers' safety is our highest priority, Kroger is a leader in recall management and communications. We consistently meet and exceed industry and government standards for recalls and product withdrawals.

Our experienced team coordinates recalls with suppliers, regulatory agencies and an internal network of food safety specialists and recall managers. This 24-hour-aday, seven-day-a-week process focuses on identifying items to be recalled or withdrawn from our distribution network and retail stores and working with appropriate teams to ensure the recalled items are quickly removed from sale. We also investigate the issue, take corrective actions and modify or create programs to minimize or eliminate similar issues in the future.

Kroger was one of the first retailers to implement a personalized customer notification system for certain types of recalls. Using our customer loyalty database, we can identify shoppers who may have purchased a specific recalled item. If a recall involves a possible health risk—such as an undeclared allergen or potential foodborne illness—we activate our notification systems to alert customers quickly through register receipts and email messages. Kroger also offers a toll-free Customer Service Center and information line staffed with professionals who can answer questions about food safety and items that may have been recalled.

In 2024, the Kroger team managed a total of 57 recall events. Of these, 25 were Class I product recalls, including 19 related to food products. None of these Class I recalls involved Our Brands items produced in a years, recalls for undeclared allergens continue to be a primary cause of Class I food recalls.

Enabling Faster Recalls

We continue to explore new ways to improve our recall management systems. The Kroger Technology & Digital team is working with the CFT team and other departments to develop systems to enable product and data mapping at every step of an item's journey through the supply chain. This will enable future compliance with the FSMA Food Traceability Rule. In 2025, the FDA extended the compliance date for this rule by 30 months.

Kroger continues to design technology systems to enable future compliance, prioritizing high-risk products identified on the FDA's Food Traceability List. In addition to enabling faster recalls, we expect this work to improve supply chain oversight and accountability for key sourcing-related goals.

Number of Class I recall events involving Kroger-manufactured Our Brands items

2022 Λ

2023

2024 0 Kroger recognizes the responsibility to protect our customers' and associates' information as well as our own data and business systems. We prioritize and invest in strong data privacy and cybersecurity practices and strive to manage information in a way that is transparent, fair and trustworthy.

The chief privacy officer leads Kroger's Privacy Office, reporting to the chief ethics and compliance officer and providing updates to an executive-level Privacy Steering Committee. The chief digital officer, chief information security officer and Cybersecurity team are responsible for cybersecurity with oversight from the Audit Committee of the Board.

Privacy

The Privacy Office leads our company-wide privacy program. It oversees Kroger's efforts to align its data privacy practices with applicable federal, state and international laws and manages risks related to the collection, use and sharing of personal data while enabling innovation and maintaining trust.

Kroger's Privacy Office is also responsible for analyzing new privacy laws, identifying potential impacts and working with the business to adjust practices, processes and communications relating to our customers' and associates' privacy. Three foundational pillars guide our privacy practices:

- Embedding responsibility and accountability for protecting personal information across our lines of business and functions
- Aligning with and meeting regulatory requirements to serve our customers and associates
- Increasing transparency in our policies and practices to clearly explain how and why we collect and process information

To build on those foundational pillars, we conduct periodic reviews of our <u>Privacy Policy</u> to make sure it is clear, easy to understand and accurately reflects our data practices, including which privacy rights are available to individuals and how we collect, use and share data.

We face an increasingly complex privacy landscape. Currently, 20 states have enacted comprehensive consumer privacy laws covering more than half of the U.S. population. In addition, several states have passed specialized privacy laws focused on consumer health data, children's data, artificial intelligence (AI) and more. Kroger's Privacy Office, Law Department and Communications & Public Affairs team monitor legislative, compliance and policy developments at federal and state levels to inform internal policies and processes designed to meet or exceed compliance standards.

Kroger continues to invest in initiatives to enhance its existing privacy practices and meet new and evolving compliance requirements. When a new state consumer privacy law goes into effect, we update our online and instore privacy notices and enable new privacy rights.

We also streamlined our internal privacy review and assessment processes by introducing a self-service portal and dashboard with enhanced visibility for leaders. We continue to increase the reach of compliance processes and cross-team collaboration to consider potential privacy impacts when designing new business processes or solutions. We also participate in various governance processes for key practices such as data sharing and responsible use of AI.

To further advance our privacy efforts, all corporate, technology and retail store associates in affected states who handle personal information complete general privacy awareness training annually.

Associates working in certain areas of the business, such as Kroger Health, are required to complete additional privacy training to improve awareness and compliance when managing protected health information. Kroger has a comprehensive policy and procedures outlining compliance with the privacy provisions of the Health Insurance Portability and Accountability Act (HIPAA) of 1996.

For more information, please see Kroger's customerfacing <u>Privacy Center</u>, a portal embedded in our websites where consumers can find information about our privacy program and practices in one convenient location. The Privacy Center includes various privacy policies and notices, terms and conditions, frequently asked questions, and links to change marketing and communication preferences, make a privacy rights request, or find support and contact information.

Cybersecurity

Kroger implements cybersecurity practices appropriate to the nature of the information we collect and use—including technical, administrative and operational procedures—to prevent loss, misuse or alteration.

Securing our business information, intellectual property, customer and associate data, and technology systems is essential for the continuity of our businesses, meeting applicable regulatory requirements and maintaining the trust of our stakeholders.

We have adopted enterprise cybersecurity risk mitigation and governance processes, outlined in detailed Kroger Cybersecurity Risk Management (CRM) and Third-Party CRM programs and a Cyber Incident Response Plan. Kroger CRM principles guide our approach to monitoring threats and vulnerabilities, and assessing and monitoring related controls.

These efforts support the Corporate Information Security function, led by the chief information security officer and chief digital officer. Kroger's cybersecurity policies, standards, processes and practices are integrated into the company's overarching risk management system in an effort to enhance our ability to safeguard our operations and information, which includes quarterly cybersecurity reporting to the Board by senior leadership.

We experience cybersecurity threats and incidents from time to time. We are not aware of any material risks from cybersecurity threats, including those that were the result of any previous cybersecurity incidents, that have materially affected or are reasonably likely to materially affect us, including our business strategy, our financial condition, results of operations or cash flows.



Public Policy Practices

Kroger actively engages in public policy and advocacy in ways that support the interests of our associates, customers, communities and company. We recognize that public policy and legislation at the federal, state and local levels can affect our business operations and our future ability to provide economic opportunities in our communities and create value for our shareholders.

Kroger's Communications & Public Affairs team leads the government relations strategy and management approach to align with responsible business practices and reflect Our Values, with oversight from the Public Responsibilities Committee of the Board. Advocacy efforts cover a wide range of topics, including topics affecting people and our planet and aligned with our Zero Hunger | Zero Waste impact plan. These include policies that increase food safety, access and security while preserving affordability for our customers.

In 2024, we expanded Kroger's Government Relations team to focus additional resources on federal policies and state legislative activity affecting our company.

KroPAC

KroPAC is the company's federal political action committee (PAC) funded by voluntary contributions from salaried management associates. PAC contributions are conducted in compliance with Federal Election Committee regulations governing solicitations. KroPAC makes contributions, where allowed, to federal, state and local political candidates, initiatives and organizations.

Other Contributions

Occasionally, and where permitted by law, Kroger may make political contributions directly to state or local candidates using corporate funds and following relevant laws and regulations.

We do not use corporate funds to air advertisements or finance specific activities in favor of or in opposition to particular candidates. For more details, see our Political Contribution Policy.

We comply with applicable laws and required reporting governing political contributions, and we publish a Political Contribution Report that outlines the source of funds for contributions, giving by political party and giving by state. This report also includes a list of national trade associations of which Kroger is a member. These associations help represent the company's perspectives to legislators and regulators; however, we do not always share the same perspectives on policy matters as these associations.

Marketing Practices & Product Labeling

Kroger develops marketing communications and integrated campaigns to help customers make purchase decisions that are right for them. We follow applicable laws, regulations and best practices and strive to work with others that do the same. Our Brands, Marketing, Media Services, 84.51° and Merchandising teams lead this work in partnership with the Kroger Technology & Digital team, Ethics & Compliance team and our Privacy Office.

Our customers tell us they value receiving personalized recommendations that deliver savings on items they purchase regularly. We use information from our loyalty program to develop personalized recommendations every week to save our customers time and money and to enhance their shopping experience. We clearly share why and how we may collect and use this information in our customerfacing Privacy Policy and Privacy Center.

To fulfill our brand promise—Fresh for Everyone—we promote healthy options like fresh, natural and organic choices across all customer segments and geographies. We work with national, regional and local media and advertising companies to connect with customers through traditional, digital and social media channels.

A defined request for information process governs how we select media companies. We ask specific questions to understand their privacy practices and how they create models and expand audiences without bias. In the increasingly complex media landscape and digital ecosystem, we ask vendors to share best practices in communicating organically with multicultural audiences.

Across our operations, we avoid targeted marketing to minors of products intended for adult purchase and consumption, including adult beverages and nicotine products.

Kroger Precision Marketing

Kroger Precision Marketing (KPM) is Kroger's retail media business. By applying 84.51° data science and Kroger's popular loyalty card program, KPM connects customers to brands through advertising.

KPM is among a small group of media publishers to achieve Platinum certification from the Trustworthy Accountability Group. The certification demonstrates a commitment to upholding brand safety, eliminating ad fraud and combating malware. In 2023, KPM became the first retail media business to join Ad Net Zero, a trade association focused on sustainability in the advertising industry.

Product Labeling

Kroger adheres to the food labeling requirements outlined by the FDA and the U.S. Department of Agriculture (USDA), including the USDA's Agricultural Marketing Service, which oversees the National Organic Program and food grading system, and the Food Safety Inspection Service, which regulates the labeling of meat, poultry and shelled egg products.

We also adhere to the Federal Trade Commission's Fair Packaging and Labeling Act, which requires that package labels identify the commodity; the name and place of business of the manufacturer, packer or distributor; and the net quantity in weight, measure or numerical count. For general merchandise items. we adhere to the requirements and guidelines set by the Consumer Products Safety Commission and state regulations to provide consumers with safe use information.

Labeling practices for items we sell in stores and online are overseen by several teams, including CFT, Ethics & Compliance, Merchandising and Our Brands. We focus first on products in the Our Brands portfolio, including Kroger-manufactured items and other items sourced or produced under contract with third-party manufacturers. For Our Brands, Kroger aims to develop accurate on-pack messages and labels that include required information and, where relevant, clear and supported claims to help inform customers of product safety information or benefits, such as allergens or health, nutrition or environmental attributes.

We expect consumer packaged goods and national brand suppliers to be responsible and accountable for complying with relevant labeling requirements. Additional information about product nutrition and sustainability is available in the Health & Nutrition and Supply Chain Sustainability sections.

Kroger monitors and implements best practices in associate training, preparedness and prevention for our stores across the country. Safety and loss prevention teams in Retail Operations and Supply Chain functions lead efforts to enhance safety and security with oversight from Kroger's senior leadership team and Public Responsibilities Committee of the Board.

Reflecting the ongoing safety incidents and threats across the retail industry, we continue to evolve our approach to increasing safety for our associates and customers.

Personal Safety

Working collaboratively with law enforcement and other authorities, we monitor risk and take proactive steps to protect our associates, customers and communities. We incorporate safety principles and best practices into facility and parking lot designs, including mobile security units and real-time video monitoring to prevent and deter safety incidents. Through a combination of Kroger and third-party services, we provide security presence at relevant stores, depending on local needs.

We also create and implement training programs to foster safe and secure workplaces. We require associates to carefully review a Personal Safety training program first introduced company-wide several years ago. This training focuses on increasing awareness of what to do in the event of an active assailant in our facilities.

If unexpected events occur on-site, we focus on how to care for our associates holistically, both at home and at work. Kroger's comprehensive benefits include free counseling and access to a well-being assistant 24 hours a day, seven days a week. We also provide specialized toolkits and training for leaders to understand how best to support their teams and have thoughtful conversations with associates about their well-being.

Preventing Theft & Loss

Kroger's Asset Protection team employs sophisticated systems to minimize theft from our stores and reduce product losses. This includes technology aimed at reducing loss at self-checkout stations and other innovative systems.

Alongside the Buy Safe America Coalition, Kroger has been on the forefront of supporting legislation that curbs the impact of organized retail crime. Organized retail crime continues to plague the industry through large-scale theft of items, which are often sold on eCommerce platforms without verification of how the seller obtained the goods. We believe our work helps protect our associates and customers while advancing safer communities.

We continue to work with national, state and local elected officials to stop crime before it starts by establishing rigorous systems and processes to address organized retail crime holistically.

Transparency for Consumers

Kroger also supported the Integrity, Notification and Fairness in Online Retail Marketplaces for Consumers Act (INFORM Consumers Act) as part of the Consolidated Appropriations Act of 2023. The INFORM Consumers Act is designed to make it easier for shoppers to identify exactly who they are buying from and make it harder for deceitful sellers to avoid identification.

Firearm Policy

Kroger does not sell firearms, and we follow local laws regarding open carry policies. We also ask our associates and customers not to bring firearms to Kroger facilities, even in communities where it's permitted.



Kroger is part of—and dependent on—global food and consumer goods supply chains. We aim to do our part to build more responsible, resilient supply chains for people and our planet.

Our Approach

We believe responsible and more sustainable sourcing enables us to continue offering our customers a wide range of affordable products. We manage sourcing topics and issues within the context of our business and *Thriving Together* strategies, recognizing there may be trade-offs and unintended consequences of specific single-topic decisions or policy changes.

Kroger's centralized Merchandising team selects the desired product assortment by category and works closely with Sourcing leaders to determine and review potential suppliers, sourcing regions and contract terms. Our management approach to responsible sourcing is led by a cross-functional Responsible Sourcing Steering Committee comprising leaders in Ethics & Compliance, Merchandising, Sourcing and Communications & Public Affairs. Kroger's senior leadership team and the Public Responsibilities Committee of the Board provide additional oversight.

Information about product sustainability and supplier expectations is included in the Planet section.

Managing Our Supply Chain

Our customers trust that the products we offer come from reputable suppliers who operate responsibly. We have relationships with many strategic, long-standing vendors, and we also welcome new vendors to bid for business. Kroger's Sourcing and Merchandising teams lead processes to identify, evaluate and onboard new suppliers to advance progress on our social and environmental goals.

Kroger has a long-standing focus on responsibly sourcing products to manage and mitigate potential supply chain risks to people and our planet. As a retailer with thousands of products in wide-ranging categories across our stores and seamless ecosystem, responsible sourcing discussions increasingly include both social and environmental topics.

Supplier Expectations

An evolving risk-based approach informs program management and responsible sourcing policies, practices and oversight. All suppliers, including those providing *Our Brands* ingredients and finished products, are expected to:

- Comply with the <u>Kroger Vendor Code of Conduct</u>, including establishing effective management systems to maintain safe, fair working environments in facilities and manage risks
- Accurately disclose and update production facilities and locations in Kroger's Supplier Hub centralized vendor management system
- Respond promptly to Kroger requests for information about potential allegations and issues
- Complete and submit required documentation, assessments and certifications upon the required schedule and agree to additional compliance assessments upon request

Many large, established Kroger suppliers already have robust management systems in place to comply with applicable laws, regulations and the Code of Conduct. We recognize that newer or smaller suppliers may need additional resources to clarify expectations and enhance their management systems in ways that work for their business. We welcome the opportunity to engage and include new brands, local farmers and growers, diverse-owned businesses and others to help them operate responsibly and have a positive impact in our communities.

Vendor Code of Conduct

Suppliers are expected to comply with the Kroger Vendor Code of Conduct as a condition of doing business with us. The Code of Conduct, which outlines expectations for responsibly managing operations and respecting the rights of workers, is informed by internationally agreed-upon standards, including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

We continue to develop new training resources for our leaders and associates who are involved in the selection and oversight of suppliers through our responsible sourcing management systems and practices. As part of our Social Compliance Program, Kroger published a new Social Compliance Assessment Guide to help suppliers understand Kroger's expectations in respecting human rights across our supply chain.

Material Topics

RESPONSIBLE SUPPLY CHAIN & SOURCING HUMAN RIGHTS ANIMAL WELFARE

Select Responsible Sourcing Policies

Kroger Vendor Code of Conduct

Social Compliance Assessment Guide

Human Rights Policy

No-Deforestation Commitment:
Our Brands

Seafood Sustainability Policy

Goal to Protect Pollinators & Biodiversity

Animal Welfare Policy



Kroger works with thousands of vendors to support our associates, serve our customers and keep our business running smoothly every day. We use data and insights to maintain and enhance management systems that help identify and mitigate potential and evolving risks in our supply chain.

Kroger's risk-based approach includes our policies, goals and expectations for vendors and others who do business with us. We also have long-standing programs in place to manage sourcing for higher-risk commodities, like seafood, palm oil and more, and we continually review emerging issues. We have an established process for reviewing issues that may arise in the supply chain.

We believe in the corrective action planning process to help suppliers build capacity to improve operating performance and correct issues wherever possible. If necessary, we stop doing business with suppliers who repeatedly violate our Code of Conduct and sourcing policies and fail to follow through on time-bound corrective action plans.

We offer resources and self-assessment tools to help suppliers of all sizes understand our expectations, evaluate where they are today and build more effective management systems for their business where appropriate.

Kroger has systems and processes in place to monitor known and emerging risks across product categories and sourcing regions. Our Responsible Sourcing Steering Committee monitors and manages critical topics, trends and risks for people and our planet. An extended team of internal and external subject matter experts also provides enhanced monitoring for topics like human rights, seafood sustainability, chemical safety, apparel production and more.

Kroger's centralized Supplier Hub vendor management system houses detailed information on suppliers' compliance with Kroger's policies and U.S. laws and regulations related to our business. It provides a mechanism for alerting teams and addressing suppliers not in compliance. Continual enhancements to the system will further improve oversight of items in production at suppliers' facilities.

In 2024, we continued to invest resources to enhance several responsible sourcing processes and tools to improve visibility to supplier, vendor and facility risk and performance over time. These tools will also help inform future decisions about product selection, sourcing regions and more to improve supplier accountability.

Supplier Inclusion

At Kroger, we know that a diverse supply chain strengthens our business, improves our customers' experience and supports our communities. We take an intentional approach to fostering the growth and development of certified, diverse-owned business enterprises through our Supplier Inclusion Program.

This program streamlines Kroger's procurement process, helping connect businesses of all sizes and sectors with the appropriate decision-makers within our company. During the past 30 years, the program has played an important role in developing Kroger's supplier network by helping businesses:

- Determine if their products and/or services align with our company's strategies
- Understand our customers' needs and trends in the marketplace
- Establish relationships and grow their impact across our communities

Our policy is that certified diverse-owned businesses have the opportunity to participate and compete for Kroger contracts. A diverse business is a company that is certified as being owned, managed and controlled by diverse individuals who meet specific criteria. We value these relationships because their products and services are often unique and popular among our customers.

We thoroughly review the certification status for diverseowned businesses and offer certified diverse suppliers an opportunity to be considered and compete for contracts.

In 2024, Kroger's total spend with diverse-owned suppliers was \$3.13 billion, a slight decrease from the prior year. A total of 837 certified diverse suppliers, including 160 new certified diverse suppliers, were part of the portfolio in 2024. Our year-over-year performance reflects the results of our improved supplier verification process.

As Kroger continues to grow, we are committed to doing our part to ensure that diverse-owned businesses have equal footing when working with our family of companies, shaping our customers' experience and growing their business with us. More information about Supplier Inclusion is available online.

Annual Spend with Diverse-Owned Businesses

2022-2024

2022 \$3.5B **2023** \$3.6B

2024 \$3.1B

Industry Collaboration

Kroger is a long-standing member of the Billion Dollar Roundtable, which promotes supply chain diversity excellence and includes member companies with a documented supply chain spend of \$1 billion or more annually.

In 2025, Kroger is collaborating with the Women's Business Enterprise National Council (WBENC) to facilitate the Industry Accelerator | Kroger Feeding Growth Opportunities program for women-owned businesses. This is the second year we are supporting an accelerator program of this kind that combines education, mentorship and pitching.

The accelerator is a multi-week, cohort-style program that culminates in a live virtual pitch competition. The program includes a public session with information about doing business with Kroger plus coaching, mentoring and capacity-building sessions for the participants with leaders from our Sourcing and Merchandising teams.

Kroger cares about the rights of those with whom we work and rely on to operate our business every day, including our own associates and other workers who produce a wide range of products for our customers and communities. We continually evolve our management approach, policies and programs to respect human rights as an element of responsible sourcing and supply chain accountability.

We outline Kroger's commitment to—and governance of—human rights in our <u>Vendor Code of Conduct</u> and <u>Human Rights Policy</u>. Our approach and these policies were developed with insights from internal and external subject matter experts, investors, NGOs and others. The Public Responsibilities and Audit Committees of the Board oversee progress on human rights and social compliance.

Information about how we support and respect the rights of our associates, including freedom of association, is included in the Labor Relations section.

Approach to Due Diligence

We recognize the role that due diligence plays in supplier oversight and accountability to prevent and mitigate adverse impacts to workers in our supply chain. Working closely with LRQA, a third-party global assurance partner, we have a dedicated team that oversees suppliers' compliance with established policies and programs. Last year, additional LRQA resources enabled a more systematic, risk-based approach to human rights due diligence.

The key elements of our human rights due diligence approach include:

- Communicating clear expectations for suppliers to comply with our Vendor Code of Conduct
- Identifying and segmenting supply chain risks

- Implementing our social compliance program, including supplier assessments, issue escalation paths and the post-assessment process
- Engaging suppliers directly with internal Merchandising, Sourcing, Compliance and Communications & Public Affairs teams to manage issues, as appropriate

Worker Voice

We believe worker voice mechanisms, such as confidential helplines, are an important tool for respecting human rights. These programs offer trusted, language-accessible ways for workers to express concerns about their work environment and experience without retaliation.

The Audit Committee of Kroger's Board established the Kroger Helpline—a toll-free phone number (800-689-4609) and website (www.Ethicspoint.com) to submit concerns. Users of the Kroger Helpline may choose to remain anonymous.

We encourage suppliers to establish or support worker voice mechanisms, monitor reports and implement time-bound corrective action plans, particularly when operating in or sourcing from higher-risk areas. We expect our suppliers to proactively develop and implement the necessary tools and resources to promote a safe and healthy workplace environment.

Impact Assessments

Human rights impact assessments (HRIAs) are another tool in due diligence processes. Kroger has completed two impact assessments to date, both conducted by third-party researchers who visited production sites, interviewed rightsholders and considered unique risks for female workers. As a follow-up to one HRIA, we conducted a worker voice mechanism pilot at select facilities in collaboration with other stakeholders and suppliers. We share an overview of the pilot and lessons learned in our HRIA Action Plan & insights Summary of the Worker Voice Pilot in India.

Social Compliance Program

Kroger's Social Compliance Program is designed to respect the rights of workers in our supply chain by assessing suppliers' alignment with the Kroger Vendor Code of Conduct. We believe suppliers are ultimately responsible for managing human rights risks in their own operations and facilities in their supply chain. Our Sourcing team oversees the social compliance program and works with third-party experts to implement assessments and measure progress. We aim to build strong supplier relationships during onboarding and through regular meetings, site visits, surveys and other tools.

All vendors and suppliers are included in the Social Compliance Program. A vendor is an organization with which we have an agreement to provide products and/or services and may or may not own the facilities that produce the goods. A supplier is an organization that owns a facility that manufactures or produces goods that Kroger purchases through the vendor.

Social compliance assessments are required for directimport national brand products where Kroger is the importer of record. We also require social audits for raw materials and ingredients used in Kroger-operated manufacturing plants and Kroger-labeled products.

Zero-tolerance findings such as bribery, forced labor and child labor result in immediate investigation and suspension or termination. Critical issues tied to responsible labor practices, business ethics and workplace hazards require timely corrective actions.

See more information about our program in Kroger's Social Compliance Assessment Guide online.

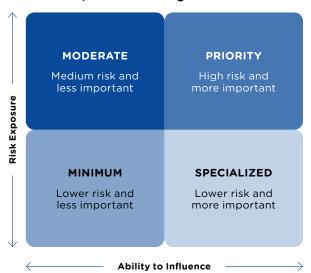
Progress Highlights

Kroger works with LRQA to manage key elements of our social compliance program and facility assessments. As we continue to evolve our program, we completed the following process improvements in 2024:

- Expanded our program capabilities, including risk segmentation, social compliance assessments and clearly defined zero-tolerance and critical issues to enable faster follow-up
- Published a new <u>Social Compliance Assessment Guide</u> to clarify expectations for suppliers and outline our program scope, tools and processes
- Strengthened supplier transparency through our centralized Supplier Hub, including required facility disclosures, compliance status tracking and defined consequences for non-compliance
- Improved corrective action plan (CAP) quality and closure rates by emphasizing root-cause analysis and clear ownership for time-bound action plans
- Implemented a mutual recognition program for select facilities through which we accept eligible audits and certifications from other programs

Kroger works with LRQA to review and segment supply chain risks and prioritize social assessments based on social and geographic factors. We classify vendors into four categories—priority, specialized, moderate and minimum—based on a combination of inherent and managed risks. We use LRQA's EiQ platform to benchmark social risk in near-real time. This enables Kroger to segment facilities using two dimensions: risk exposure level (high, medium, low) and ability to influence risk (high, medium, low). This risk classification informs decisions and next steps in sourcing and supplier engagement.

Social Compliance Risk Segmentation



EiQ also supports active monitoring of social compliance assessment progress, CAPs, worker sentiment surveys and self-assessment questionnaires. Through LRQA's Sentinel feature, Kroger proactively tracks global risk alerts and engages vendors when risk factors change, enabling timely response planning.

This risk segmentation helps determine the most suitable assessment tools and support resources for different sectors and geographies. It also enables more strategic interventions and effective use of capacity-building programs, especially for sites in priority and moderate risk segments. After careful review, we may continue working with vendors sourcing from higherrisk locations to meet our customers' needs. In this case, our program includes increased oversight and engagement with the vendors.

Assessment Process

While social compliance assessments are not the solution to worker-related issues in global supply chains, they are a foundational element and provide important insights. We use a suite of assessment tools tailored to facility-specific risks, including the LRQA-owned ERSA 3.0 comprehensive responsible sourcing assessment, worker sentiment surveys and worker voice helplines. These tools enable Kroger to select appropriate assessments for certain sectors instead of a one-size-fits-all approach.

LRQA conducts these assessments, including the standard ERSA 3.0 audit. In 2024, Kroger adopted this standard ERSA tool, which LRQA recently updated to include more than 230 additional data points and strengthen standards in certain areas. Outside of the defined Social Compliance Program scope, Kroger's general merchandise suppliers may be subject to facility audits managed by Li & Fung, Ltd.

In 2024, more than 83% of ERSA assessments were conducted at higher-risk facilities in our supply chain. We conducted the highest number of assessments at suppliers' production sites located in China, India, Vietnam and Thailand. Of all facilities assessed last year, 16% were approved, 76% were approved with CAPs and 8% had findings that required significant improvement.

We also developed a mutual recognition program for select facilities based on risk analyses and by invitation. For produce and/or floral vendors, for example, Kroger will accept Fair Trade USA, Equitable Food Initiative or Florverde certifications and the Ethical Charter Implementation Program.

Corrective Action Plans

When assessments identify critical issues, we require suppliers to develop time-bound CAPs and report progress. As part of our program evolution, we are improving how we manage the CAP process and providing resources to help suppliers improve their management systems. In 2024, Kroger started using the LRQA EiQ Assess platform for CAPs to more effectively track next steps with facilities.

Lack of transparency during the assessment process may be an indicator of more egregious issues, so we make our expectations of transparency clear to all suppliers. When suppliers have repeated non-transparency findings in their audits, we work with them directly to resolve the issue or terminate the supply agreement, if the issue persists. Assessment findings that fall into the most severe category include evidence of forced labor, child labor or attempted bribery.

Depending on the situation, we may suspend or terminate the supply contract if alerted to these findings, following our established escalation paths.

Kroger monitors CAP closure rates—the percentage of CAPs that are successfully closed in the agreed-upon time—as an indicator of program effectiveness. In 2024, our CAP closure rate was 95%, an improvement from the prior year. As part of our evolving program, we shortened the time for facilities to submit a CAP by 50% to encourage faster corrective actions, and we updated our CAP system to be more user-friendly for suppliers and facility managers. We also offer digital learning courses to increase vendors' awareness of risks and enhance their management systems.

Ethical Charter Implementation Program: Produce & Floral Suppliers

Kroger remains focused on advancing responsible labor practices across the fresh produce and floral supply chain through the Ethical Charter Implementation Program (ECIP). Kroger encourages growers to join the ECIP, which is grounded in the Ethical Charter on Responsible Labor Practices, endorsed by the International Fresh Produce Association and managed by the Ethical Food Initiative (EFI).

As a founding member of the Ethical Charter, Kroger helped shape ECIP's development with other retailers and food buyers. Since the launch of ECIP in November 2023, we have encouraged growers' participation and adoption of Ethical Charter principles. This includes using the ECIP Learn, Assess and Benchmark (LAB) platform.

In 2024, the Kroger team dedicated significant time to onboarding suppliers to ECIP. Today, the majority of our top 100 produce suppliers by volume and spend have joined ECIP. Our engagement helped suppliers begin self-assessments through the confidential LAB platform, which is designed to promote thoughtful internal review rather than compliance audits. Feedback from suppliers indicates that Kroger's outreach helped growers understand our expectations and engage more meaningfully with the platform.

Total ECIP membership includes more than 266 suppliers and 1,000 growers that work with Kroger and other buyers.

We are also an active member of ECIP's Advisory Group, working closely with other buyers, suppliers and EFI to improve the platform, increase engagement and address evolving labor challenges.

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Animal Welfare

The welfare of animals in our protein supply chain has long been a priority for Kroger. We aim to advance the welfare of animals that produce food while balancing other strategic priorities that affect people and our planet. We work with suppliers, animal welfare experts and other stakeholders to advance standards that protect workers and animals and that preserve access to affordable proteins for our customers.

The company's Corporate Food Technology team leads our approach to animal welfare in the context of animal agriculture and sustainable protein production, with oversight from senior leaders and the Public Responsibilities Committee of the Board.

Our Approach

We outline our approach in Kroger's Animal Welfare Policy, which was developed with insights from internal and external subject matter experts. Our policy reflects the Five Domains of Animal Welfare, an internationally respected approach that emphasizes current animal science and outcome-based standards.

Our primary focus remains advancing welfare for laying hens, pigs, broiler chickens and dairy cattle in ways that preserve affordability for our customers. Kroger is not directly involved in raising or harvesting any animals in our protein supply chain. We require suppliers to adopt industry-accepted animal welfare standards and provide welfare audit results. We comply with applicable laws and regulations.

We participate in industry groups and collaborative platforms to stay informed of key developments in animal welfare and protein production. This includes the Global Coalition for Animal Welfare (GCAW), a multi-stakeholder group of protein producers, foodservice companies, restaurants and retailers. GCAW is administered by a secretariat and has dedicated working groups to advance welfare for laying hens, pigs and broiler chickens.

Laying Hens

Kroger is working with suppliers, animal welfare experts and other stakeholders to support the transition to cage-free or higher-welfare laying hen housing systems over time. We will continue to offer a variety of eggs to ensure that affordable, healthy protein options are accessible for all Kroger customers.

Given the current rate of industry progress and our customers' desire for affordability, Kroger plans to transition about 70% of eggs sold (by units) to cage-free or higher-welfare standards by 2030. We established the following tentative milestones along the way: 2022: 33% (achieved); 2024: 41% (achieved); 2025: 54%; and 2028: 61%. We will determine whether continued progress beyond 2030 is feasible and if so, by when, based on customer insights, regulatory timelines and industry transition. Kroger plans to invest about \$45 million in support of this roadmap, including investments in sourcing agreements, pricing, promotions and merchandising.

In 2024, cage-free eggs represented 55.9% of total egg revenue company-wide (2023: 54.1%). On a volume basis, units of shell eggs sourced from laying hens in cagefree housing systems increased to 43.3% in 2024 (2023: 36.1%).1 We exceeded our 2024 roadmap milestone despite the widespread impacts from avian influenza, which significantly affected domestic flocks, available egg supplies, and wholesale and retail prices.

Kroger continues to encourage our customers to trade up to higher-welfare egg options where feasible. Based on availability, we offer affordable Simple Truth® cagefree eggs, promote cage-free or higher-welfare eggs in weekly advertising circulars, and dedicate preferred shelf space to higher-welfare options.

In 2022, Kroger and Kipster Farms, the innovative egg production system founded in the Netherlands, introduced next-level cage-free eggs to customers in the U.S. The Simple Truth® + Kipster eggs are currently available for customers in western U.S. states.

Late last year, the Kroger team introduced a pilot to test at-shelf signs that more clearly explain different hen housing systems and egg carton labels for customers. The signs included descriptions for conventional, cage-free, Simple Truth® + Kipster, freerange, pasture-raised and organic eggs.

Our goal was to learn whether more descriptive at-shelf signs would motivate customers to buy higher-welfare egg options. We planned to evaluate test results after six months; however, supply chain impacts from avian influenza in 2025 affected our customers' purchasing behavior and test results. We will conduct another test in early 2026 if egg supply is stable after the winter avian influenza season.

Pigs

We encourage suppliers to use group housing systems for sows to shorten time in individual stalls, enhance health and welfare, protect workers and preserve access to affordable fresh pork for our customers. We define group housing as systems where sows are moved to group pens for the middle phase of gestation as early as possible, no later than six weeks after breeding.

Kroger's goal is to source 100% of fresh pork from sows in group housing systems by the end of 2025. We established the following milestones: 65% by 2023 (achieved); 75% by 2024 (achieved); and 100% by 2025.

In 2024, 90% of our fresh pork volume was sourced from sows in group housing, exceeding our milestone. We are on track to achieve 100% by the end of 2025.

Our current goal does not include processed pork items like bacon and cooked ham. Focusing on fresh pork is positively affecting other pork products. Due to our current labeling practices, we are unable to report revenue from fresh pork from sows in group housing systems as a percentage of total fresh pork revenue.

Broiler Chickens

Kroger aimed to achieve progress on four welfare enhancements for at least 50% of our Simple Truth Organic® and Simple Truth Natural® fresh chicken by the end of 2024. The following are our 2024 yearend results:

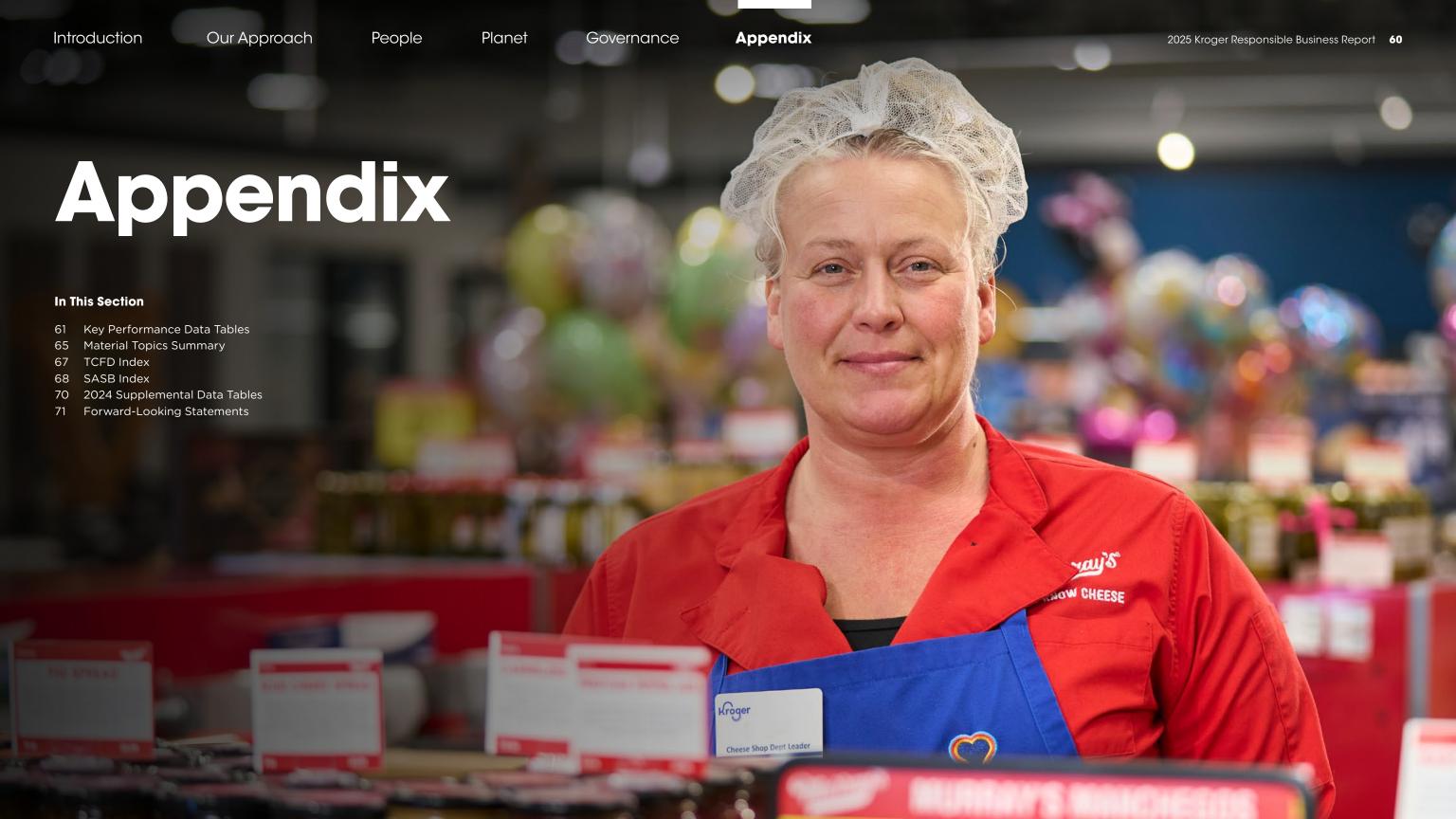
- Prohibit broiler cages (achieved)
- Maximum stocking density of 6.0 pounds per square foot (36.6%)
- Enriched environments, including litter and lighting (71.4%)
- Processing in a manner that avoids pre-stun handling and uses a controlled atmosphere system (CAS) to induce an irreversible stun (16.9%)

Progress on our broiler chicken welfare goals was affected by producers' slower-than-anticipated pace of infrastructure investments, as well as their heightened focus on preventing the spread of avian influenza among domestic flocks.

Dairy Cattle

Cooperatives supplying milk to Kroger's manufacturing plants and Our Brands grocery assortment must be in good standing with the National Dairy Farmers Assuring Responsible Management (FARM) Animal Welfare Program. We encourage suppliers to adopt updated versions of the FARM Animal Care standard, FARM Animal Care Version 5, released in 2024, focuses on refining and clarifying previous standards surrounding euthanasia, fitness for transport, calf management and continuing education, among others.

Kroger is a signatory to the U.S. Dairy Stewardship Commitment, supporting efforts to minimize dairy production impacts on people and our planet.



The Kroger team recognizes our unique role in the future of food. We are helping build a more resilient and equitable food system that preserves access and affordability today and in the future—by advancing more responsible and sustainable production methods for the food and consumer goods on which we all depend.

People: Serving Our Associates, Customers and Communities

Goals & Metrics	2022	2023	2024	Baseline	Target Year	Status
Associate Wages & Benefits						
Cumulative investment in our associates' compensation and benefits	\$1.9B	\$2.4B	\$2.7B	2018	-	
Increase average retail hourly wages and benefits over time	Over \$18/hour; over \$23.50/hour including benefits	Over \$19/hour; nearly \$25/hour including benefits	Nearly \$19.50/hour; Nearly \$25.35/hour including benefits	-	-	- -⊘-
Food Access & Affordability						
Increase annual sales of affordable, quality Our Brands portfolio of products	\$30B	\$31B	\$32B	-	-	
Introduce new affordable Our Brands products, including fresh items	680	700+	900+	-	-	
Annual total meals donated to our communities—food and charitable donations	599M	455M	518M	-	-	
Cumulative total meals donated since 2017—food and donations	2.9B	3.4B	3.9B	2017	2025	©
Donate surplus fresh food from stores and facilities to our communities through Kroger's Zero Hunger Zero Waste Food Rescue program	106M pounds	114M pounds	119M pounds	-	-	·
100% of retail stores actively donating surplus fresh food	100%	100%	100%	2017	2025	
Charitable Giving						
Total annual charitable giving to our communities	\$336M	\$329M	\$346M	-	-	
Share of total charitable giving donated to national and local organizations helping end hunger	\$253M	\$256M	\$276M	-	-	
Supplier Diversity & Inclusion: Certified diverse-owned suppliers have the opportunity to participate and compete for contracts						
Annual spend with certified diverse-owned businesses ¹	\$3.5B	\$3.6B	\$3.1B	-	-	







Area of focus









Planet: Protecting Natural Resources for a Brighter Future

Goals & Metrics	2022	2023	2024	Baseline	Target Year	Status
Climate Impact ¹						
Achieve a 30% cumulative reduction in GHG emissions (percentage reduction from baseline; annual total Scope 1 and 2 GHG emissions)	15.2% 4,894,705 MTCO ₂ e	12.0% 5,081,613 MTCO ₂ e	14.9% 4,916,373 MTCO ₂ e	2018	2030	
Waste & Circularity						
Operational Waste						
Achieve 90%+ waste diversion from landfills company-wide ²	82%	82%	85%	2016	2025	Ø
Food Waste						
Reduce total food waste generated in retail stores by 50% cumulatively from 2017 baseline (cumulative reduction; annual tons generated)	26.2% 245,289 tons	20.0% 265,773 tons	3.8% 319,720 tons	2017	2025	\bigcirc
Achieve 95% diversion of remaining retail food waste from landfill	45.9%	51.7%	58.2%	2017	2025	Q
95% or more of retail stores participating in food waste recycling programs	92%	95%	97%	2017	2025	②
Our Brands Product Packaging Sustainability ³						
Seek to achieve 100% recyclable, compostable and/or reusable packaging	37%	52%	Assessed periodically ⁴	2020	2030	- ⊘→
Increase recycled content in packaging so Our Brands portfolio collectively contains at least 10% recycled content	18%	10%	Assessed periodically ⁴	2020	2030	
Biodiversity & Resource Conservation						
Pollinators						
100% of fresh produce suppliers to implement Integrated Pest Management practices for all products supplied to Kroger as demonstrated by one of the accepted certifications	-	-	_ 5	-	2028; 2030	\bigcirc













^{1.} Scope 3 emissions are reported in the Climate Impact and Supplemental Data sections of the report

^{2.} Progress reflects calendar year data with the exception of construction waste, which reflects fiscal year

^{3.} We calculated our first packaging baseline for Our Brands products in 2022 for the 2021 performance year. The current dataset is focused on Our Brands food; health and beauty; cleaning; and deli and bakery products. We continue to expand on and improve our packaging dataset, particularly as we prepare for legislated reporting in the future. Narrative about additional stated packaging sustainability goals is included in the Waste & Circularity section of the report

^{4.} Moving forward, we will calculate and report on goal progress every other year. The company has dedicated resources to preparing for extended producer responsibility reporting and other packaging legislation preparation. We will report on 2025 progress in the 2026 Responsible Business report

^{5.} We are establishing the implementation process for this goal and will report our progress in future years

Introduction Planet Our Approach People Governance

Goals & Metrics 2022 2023 2024 **Baseline Target Year** Status Seafood Sustainability¹ Source 95% or more of wild-caught seafood from fisheries that are Marine Stewardship Council (MSC) certified, in MSC full assessment, 95% 96% 97% 2020 Ongoing in comprehensive fishery improvement projects or certified by other Global Sustainable Seafood Initiative-recognized programs Preferentially source wild-caught seafood volume from fisheries that are MSC certified 76% 80% 80% 2020 Ongoing Source 95% or more of farm-raised seafood from farms that are Best Aquaculture Practices 2-Star or greater certified, Aquaculture -(~)-99% 2020 98% 99% Ongoing Stewardship Council certified or GLOBALG.A.P. certified 98% Source 100% of shelf-stable tuna from companies aligned with the International Seafood Sustainability Foundation² 99% 98% 2020 Ongoing -(~)-Source 20% of Our Brands shelf-stable tuna from fisheries that are MSC certified 17.7% 7.3% 24% 2020 2025 No-Deforestation Commitments³ Source palm oil, palm kernel oil and palm oil derivatives in Our Brands products from sources certified to the Roundtable on Sustainable -(~)-96% 98% 94% N/A Ongoing Palm Oil supply chain standard (percentage of ingredient volume that is from certified sources) Used post-consumer recycled content fiber and/or virgin fiber certified to FSC, SFI or PEFC standard **-(**\(\sigma\) Kroger plants (percentage of packaging procured, by weight, from certified sources and/or including recycled content) 95% 99% 94.2% N/A 2025 All Our Brands household paper products and paper product packaging (percentage of material, by weight, from certified sources and/ Household: 93% Household: 94% -(~)-Assessed periodically4 N/A 2030 or including recycled content) Packaging: 45% Packaging: 45% Use deforestation-free soy-based ingredients in Our Brands products --99% 99% 99.9% N/A 2025 Kroger plants (percentage, by weight, from no-/low-risk countries) All third-party produced *Our Brands* products (percentage, by weight, from no-/low-risk countries) Assessed periodically 93%5 Assessed periodically4 N/A 2030 Use deforestation-free beef-based ingredients in Our Brands products and fresh beef Beef in fresh meat department and Kroger plants (percentage, by weight, harvested in no-/low-risk countries; born, raised and 99% (78%) 97% (94%) 97.6% (93.6%) N/A 2025 harvested in no-/low-risk countries) -(~)-All third-party produced *Our Brands* products (percentage, by weight, from no-/low-risk countries) 50%⁶ N/A 2030 Assessed periodically Assessed periodically⁴

Appendix













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^{1.} Progress reflects calendar year data. In 2024, we revised the goals to make them ongoing so that we continue to strive for and maintain 95% or greater alignment with Kroger's Seafood Sustainability Policy for our Seafood department

^{2.} This is an enduring commitment that we continue to maintain. Percentages are measured by volume

^{3.} No-deforestation goal progress reflects calendar year data with the exception of our packaging baseline calculation, which reflects fiscal year data. Data reflects responses received from suppliers and is to the best of their knowledge. In some cases, proxy data from prior year may be used

^{4.} Moving forward, Kroger will report progress on 2030 no-deforestation commitments for beef, soy and paper ingredients every other year. We will report 2025 progress in the 2026 Responsible Business report

^{5.} In 2023, 93% of soy-based ingredients in Kroger third-party-manufactured Our Brands products were from low- or no-deforestation risk regions, and 2% were from potentially high-risk regions. Suppliers of products with the remaining 5% of ingredients could not provide visibility to the country of origin

^{6.} In 2023, 50% of beef-based ingredients in Kroger third-party-manufactured Our Brands products were from low- or no-deforestation risk regions, and 49% were from potentially high-risk regions. Suppliers of products with the remaining 1% of ingredients could not provide visibility to the country of origin

Goals & Metrics	2022	2023	2024	Baseline	Target Year	Status
Responsible Sourcing: Animal Welfare						
Laying Hen Housing						
Revenue: Increase sales of shell eggs from laying hens in cage-free or better housing systems as a percentage of total egg revenue ¹	32.3%	54.1%²	55.9%	-	-	
Volume: Increase shell eggs sourced from laying hens in cage-free housing systems or better (units: dozens) to 70% ¹	33.6%	36.1%³	43.3%	-	2030	
Sow Housing						
Volume: By 2025, Kroger aims to source 100% of fresh pork from sows in group housing systems, based on availability	_4	62.2%	90%	-	2025	
Broiler Chicken Welfare⁵						
Achieve the following welfare enhancements in at least 50% of our supply for Simple Truth Organic® and Simple Truth Natural® fresh chicken:						
Maximum stocking density of 6.0 pounds/sq. foot	17.9%	37.8%	36.6%	-	2024	0
Prohibit broiler cages	100%	100%	100%	-	2024	⊘
Enriched environments, including litter and lighting	41.9%	39.5%	71.4%	-	2024	⊘
Processing in a manner that avoids pre-stun handling and uses controlled atmosphere systems (CAS)	10.9%	14.5%	16.9%	-	2024	0















^{1.} Restated progress to align shell egg units to dozens for all years

^{2. 2023} revenue figure is restated from 51.9% to 54.1% to reflect revised data

^{3. 2023} volume figure is restated from 33.6% to 36.1% to reflect revised data

^{4.} Given the lack of industry alignment on standards and definitions for sow housing, we are unable to determine accurate year-over-year performance for 2022 and prior years

^{5.} Goal progress is impacted by industry challenges, such as the time and cost required to transition growing operations to larger barns and CAS systems

Responsible Business Topic Definitions

To address the complex issues most relevant to our business, we continue to learn from internal and external stakeholders through the materiality assessment process and ongoing engagement. The topics listed below were identified and prioritized in our latest materiality assessment, completed in early 2023. We outline the process and results of this double materiality assessment on pp. 8–9 of this report.

People	Topic Definition	Tier	Location
Customer Experience	Providing exceptional service and value and improving the customer experience through advances in areas such as online ordering, home delivery and digital solutions that offer greater flexibility for how customers shop. Engaging with customers and measuring customer satisfaction.	2	Page <u>24</u>
Diversity & Inclusion	Building a diverse and inclusive workforce, fostering an environment of nondiscrimination and providing equal opportunities for associates.	2	Page <u>22</u>
Employee Health, Safety & Well-Being	Providing safety training and equipment, safe working conditions and access to resources to maintain and improve associates' health and well-being.	2	Page <u>23</u>
Food & Product Access & Affordability	Increasing equitable access to affordable fresh foods to improve food security as well as affordable non-food products and other essentials. Promoting inclusive products to support a wide range of customers' preferences and needs. Optimizing digital capabilities to advance food and product access.	1	Pages <u>11</u> , <u>25</u>
Food Safety	Promoting food safety in our manufacturing plants, distribution centers and retail stores by establishing and maintaining science-based food preparation and handling policies and processes. Developing and maintaining programs to address emerging food safety topics. Managing product recalls efficiently.	1	Page <u>50</u>
Health & Nutrition	Encouraging customers to purchase healthier and more nutritious food. Increasing awareness of the nutritional value of food and health improvement opportunities among customers and advancing nutrition security and wellness in our communities. Providing accessible pharmacy and retail health clinic services.	1	Page <u>26</u>
Labor Relations	Promoting fair labor practices, respecting associates' freedom of association and right to collective bargaining, and participating in proactive conversations with associates, including those covered by collective bargaining agreements.	2	Page <u>21</u>
Local Communities	Using community engagement principles to share updates on the company's business and operations, discuss community priorities, participate in local events, provide charitable support and more. Creating direct and indirect economic value in local communities where associates and customers work and live through local hiring, volunteerism and giving.	2	Page <u>28</u>
Non-Food Product Safety	Providing customers with high-quality non-food products (health and beauty products, apparel, home goods and more) that meet or exceed safety and regulatory requirements. Setting robust standards for suppliers that produce non-food products.	3	Page <u>50</u>
Retail Security	Promoting the physical safety of retail supermarkets by increasing associates' awareness and preparedness for managing security events or issues, including theft, organized retail crime, active assailant situations or open carry laws. Optimizing digital capabilities and advanced technologies to improve retail security.	3	Page <u>54</u>
Talent Attraction, Engagement & Retention	Creating and maintaining a workplace of choice by offering competitive wages, quality benefits and a company culture that offers purpose-driven work and opportunities for advancement. Increasing associate engagement and training and improving job performance and retention. Using technology to improve talent attraction, engagement and retention.	1	Pages <u>19</u> , <u>20</u>

^{1.} Topics and definitions reflect input from Kroger's stakeholders through regular engagement and this materiality assessment process. Definitions provide the boundaries for each topic and do not reflect a specific company policy or commitment

Planet	Topic Definition	Tier	Location
Agricultural Practices	Promoting responsible pesticide, fertilizer and soil management practices, including efforts to reduce negative impacts on pollinators. Supporting regenerative and resilient agriculture methods, such as crop cycling, agroforestry, livestock integrations, no- or low-till techniques and cover crops.	2	Page <u>43</u>
Biodiversity & Conservation	Conserving natural resources and biodiversity by supporting responsible land management and forestry practices in our operations and supply chain, including efforts to reduce deforestation and land-use change. Offering wild-caught and farm-raised seafood from certified sources, supporting fishery improvement projects and removing at-risk species from products and stores.	3	Page <u>43</u>
Climate Change Resilience	Anticipating, preventing and mitigating long-term effects of climate change on our business and supply chain, including extreme weather conditions, regulatory changes and technology changes.	2	Page <u>37</u>
Energy & GHG Emissions	Collecting and measuring Scope 1, 2 and 3 GHG emissions data from building and fleet management in the company's retail, manufacturing, supply chain and other operations, as well as upstream and downstream in the value chain. Conducting activities that seek to meet emissions-reductions targets, including improvements in energy efficiency, reduction of refrigerant emissions and increased use of renewable energy.	1	Pages <u>34</u> , <u>70</u>
Food Waste	Reducing the amount of food waste generated in the company's operations, recovering safe unsold surplus food for donation to feed people, and diverting from landfill any inedible food scraps through food waste recycling programs.	1	Pages <u>11</u> , <u>39</u>
Waste & Circularity	Diverting non-food waste from landfill through increased waste reduction, reuse and recycling in the company's operations. Adopting circular economy principles to promote product and packaging sustainability, including reducing unnecessary materials; increasing recyclability, reusability and compostability; and supporting infrastructure growth that enables circularity. Providing recycling information to customers.	2	Pages <u>11</u> , <u>38</u> , <u>41</u>
Water	Reducing water use, increasing water reuse and managing water discharge quality across the company's operations to protect local water sources.	3	Page <u>46</u>
Governance	Topic Definition	Tier	Location
Animal Welfare	Advancing the humane treatment of animals in our supply chain by requiring suppliers to adhere to stated policies and expectations and encouraging improvements in protein production practices. Offering a range of alternative proteins and product choices.	3	Page <u>59</u>
Business Ethics & Compliance	Operating in an ethical manner and in compliance with applicable regulations, including anti-corruption, anti-bribery and anti-competitive practices. Maintaining and enforcing policies and operating procedures to protect associates, customers, communities and the environment.	2	Page <u>49</u>
Corporate Governance	Implementing and maintaining strong governance practices that include checks and balances and enable the company's leadership team and Board of Directors to have appropriate control and oversight of key topics. Establishing and disclosing processes to integrate responsible business priorities into overall corporate governance practices.	2	Page <u>48</u>
Data Privacy & Cybersecurity	Promoting data privacy and security for associates, customers and suppliers, and implementing controls to prevent, detect and respond to security incidents or data breaches. Ensuring the ethical use of data and responsible use of technology across all aspects of the business and value chain.	1	Page <u>52</u>
Human Rights	Respecting human rights in the company's operations and supply chain, including risks of forced labor, migrant labor, child labor, health and safety, discrimination, harassment, abuse, working hours and wages. Considering Indigenous people and land rights that may be affected by food and non-food production in the supply chain.	3	Page <u>57</u>
Marketing Practices & Product Labeling	Providing clear, fact-based and transparent nutrition labeling, including information on GMOs, geographic origin and more for items sold. Working with suppliers to ensure product attributes are truthfully and responsibly communicated to customers in stores, online and through advertising.	3	Page <u>53</u>
Public Policy Practices	Actively participating in forming and shaping federal, state and local public policy on issues that affect the company's business operations.	3	Page <u>53</u>
Responsible Supply Chain & Sourcing	Promoting responsible sourcing and procurement practices that consider sourcing-related risks and opportunities for people and our planet. Holding suppliers accountable for established policies, expectations and goals. Working to improve the traceability of products throughout the supply chain, especially for high-impact commodities. Optimizing capabilities to improve supply chain processes.	1	Page <u>55</u>

Below we provide references to where our reporting responds to the TCFD recommended disclosures. We include references to the relevant content in this Responsible Business Report, our Annual Report, our response to the CDP Climate questionnaire¹ and other resources.

Section	Description	Link to Content
Caucamana	Describe the Board's oversight of climate-related risks and opportunities	2025 Responsible Business Report (Climate Impact, Corporate Governance) CDP C.04 Governance
Governance	Describe management's role in assessing and managing climate-related risks and opportunities	2025 Responsible Business Report (Climate Impact, Corporate Governance) CDP C.04 Governance
	Describe the climate-related risks and opportunities the organization has identified over the short, medium and long term	2025 Responsible Business Report (<u>Climate Impact</u>) <u>Kroger Annual Report</u> (Climate Resiliencies, Risk Factors) CDP C.03 Disclosure of Risks and Opportunities
Strategy	Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy and financial planning	2025 Responsible Business Report (<u>Climate Impact</u>) <u>Kroger Annual Report</u> (Climate Resiliencies, Risk Factors) CDP C.03 Disclosure of Risks and Opportunities, C.05 Business Strategy
	Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	2025 Responsible Business Report (<u>Climate Impact</u>) <u>Kroger Annual Report</u> (Climate Resiliencies, Risk Factors) CDP C.03 Disclosure of Risks and Opportunities, C.05 Business Strategy
	Describe the organization's processes for identifying and assessing climate-related risks	2025 Responsible Business Report (<u>Climate Change Resilience</u>) CDP C.03 Disclosure of Risks and Opportunities
Risk Management	Describe the organization's processes for managing climate-related risks	2025 Responsible Business Report (<u>Climate Change Resilience</u>) CDP C.03 Disclosure of Risks and Opportunities
	Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organization's overall risk management	2025 Responsible Business Report (<u>Climate Impact</u> , <u>Material Topics</u>) <u>Kroger Annual Report</u> (Climate Resiliencies, Risk Factors) CDP C.03 Disclosure of Risks and Opportunities, C.05 Business Strategy
	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process	2025 Responsible Business Report (Emissions-Reduction Goals, Emissions Disclosure, Appendix) CDP C.03 Disclosure of Risks and Opportunities, C.07 Climate Change
	Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas emissions and the related risks	2025 Responsible Business Report (Emissions-Reduction Goals, Appendix) CDP C.07 Climate Change
Metrics & Targets	Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets	GHG Reduction Goal GHG Reduction Goal Roadmap 2025 Responsible Business Report (Emissions-Reduction Goals, Managing Food Waste, Waste & Circularity, No-Deforestation Goal, Packaging Sustainability) CDP C.07 Climate Change No-Deforestation Commitment: Our Brands Sustainable Packaging Goals

^{1.} We do not include direct links to our CDP Climate response because these are no longer publicly available. Users can visit www.cdp.net to access disclosed data

Below we provide additional specific disclosures and references to where our reporting aligns with the SASB Sustainability Accounting Standard for Food Retailers & Distributors.

Topic	Accounting Metric	Unit of Measure	Company Response
Fleet Fuel Management	Fleet fuel consumed, percentage renewable	Gigajoules (GJ), Percentage (%)	5,036,449 GJ; 0%
	Gross global Scope 1 emissions from refrigerants	Metric tons (MT) CO ₂ e	1,329,023 MTCO ₂ e
Air Emissions from Refrigeration	Percentage of refrigerants consumed with zero ozone-depleting potential (ODP)	Percentage (%) by weight	92% of refrigerants consumed in Kroger's retail stores are zero-ODP
sions from Northgeration	Average refrigerant emissions rate	Percentage (%)	The average leak rate for all commercial refrigeration and HVAC systems in Kroger's supermarkets was 11.1% in 2024
Energy Management	(1) Operational energy consumed, (2) percentage grid electricity,(3) percentage renewable	Gigajoules (GJ), Percentage (%)	(1) 41,291,473 GJ; (2) 61%; (3) 1%
Food Waste Management	Amount of food waste generated, percentage diverted from the waste stream	Metric tons (MT), Percentage (%)	319,720 MT, 58% (for retail stores)
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected	Number, Percentage (%)	(1) Zero; (2) 0%; (3) Zero
	Description of approach to identifying and addressing data security risks	n/a	See Privacy & Cybersecurity section
	High-risk food safety violation rate	Rate	Average of 1.02 critical violations per audit in 2024
Food Safety	(1) Number of recalls, (2) number of units recalled, (3) percentage of units recalled that are private-label products	Number, Percentage (%)	There were zero recalls for Kroger-manufactured <i>Our Brands</i> products; see Recall Management section for additional discussion
Product Health & Nutrition	Revenue from products labeled and/or marketed to promote health and nutrition attributes	Reporting currency	We are unable to disclose this information at this time
	Discussion of the process to identify and manage products and ingredients related to nutritional and health concerns among consumers	n/a	See <u>Health & Nutrition</u> section
	Number of incidents of non-compliance with industry or regulatory labeling and/or marketing codes	Number	Zero
Product Labeling & Marketing	Total amount of monetary losses as a result of legal proceedings associated with marketing and/or labeling practices	Reporting currency	We do not report this publicly
	Revenue from products labeled as (1) containing GMOs and (2) non-GMO	Reporting currency	We are unable to disclose this information at this time

Topic	Accounting Metric	Unit of Measure	Company Response
	(1) Average hourly wage and (2) percentage of in-store and distribution center employees earning minimum wage, by region	Reporting currency, Percentage (%)	(1) Average hourly wage is more than \$19/hour; (2) We do not report this publicly
Labor Practices	Percentage of active workforce covered under collective bargaining agreement	Percentage (%)	64% of associates are covered by collective bargaining agreements
Labor Practices	(1) Number of work stoppages and (2) total days idle	Number, Days idle	(1) One work stoppage; (2) Six days idle
	Total amount of monetary losses as a result of legal proceedings associated with: (1) labor law violations and (2) employment discrimination	Reporting currency	We do not report this publicly
	Revenue from products third-party certified to environmental or social sustainability sourcing standard	Reporting currency	We are unable to disclose this information at this time
Management of Environmental &	Percentage of revenue from (1) eggs that originated from a cage-free environment and (2) pork produced without the use of gestation crate	Percentage (%) by revenue	(1) 55.9%; (2) Revenue sales are not currently able to be tracked (though we do track volume of pork sourced)
Social Impacts in the Supply Chain	Discussion of strategy to manage environmental and social risks within the supply chain, including animal welfare	n/a	See <u>Thriving Together Strategy</u> and <u>Responsible Supply Chain & Sourcing</u>
	Discussion of strategies to reduce the environmental impact of packaging	n/a	See Packaging Sustainability

2024 Supplemental Data Tables

Energy & Emissions

Energy Consumption ¹	Amount	Unit	Amount	Unit	Change vs. 2023
Total fuel consumed	4,515,784	MWh	1.63E+07	GJ	-11%
Stationary sources (natural gas, propane, fuel, oil)	3,116,771	MWh	1.12E+07	GJ	-11%
Mobile sources (diesel, gasoline, liquefied petroleum gas, jet fuel)	1,399,014	MWh	5.04E+06	GJ	-12%
Renewable fuel	-	MWh	-	GJ	-
Total electricity consumed	6,954,069	MWh	2.50E+07	GJ	+3%
Renewable electricity ²	48,598	MWh	1.75E+05	GJ	-50%
Total energy consumed	11,469,853	MWh	4.13E+07	G1	-3%

- 1. This data reflects the vast majority of Kroger's operations, with a few exceptions
- 2. This data reflects renewable electricity consumed as a result of renewable power generated at our facilities or purchased directly from our utility providers. In 2024, the amount of renewable energy purchased from utility providers declined due to unfavorable costs

Energy³/Carbon⁴ Intensity	Amount	Unit	Change vs. 2023
Normalizing factor: facility footprint	238,676	1,000 ft ²	-
Energy intensity per square foot	48.1	MWh/ 1,000 ft ²	-12.9%
Total corporate carbon emissions intensity per square foot	20.6	tCO ₂ e/ 1,000 ft²	-13.5%

- 3. The energy intensity calculation reflects total energy consumed within the organization
- 4. This calculation reflects market-based Scope 2 emissions

Health & Safety

Metric	Associates	Contractors
Injury rate (OSHA injuries/100 full-time employees (FTE)) ⁵	2.84	2.08
Lost day rate (OSHA lost time rate/100 FTE) ⁶	2.29	1.45

- 5. Injury rate includes injuries greater than minor injuries (first aid) per OSHA reporting requirements
- 6. We classify lost days as calendar days. Lost days begin the day after the injury

Carbon Emissions ^{7,8}	2024 Emissions (MTCO ₂ e)	Change vs. 2023
Direct (Scope 1) emissions	2,240,536	-2.1%
Stationary	563,167	+2.0%
Mobile	348,347	-6.2%
Fugitive	1,329,023	-2.6%
Indirect (Scope 2) emissions (location-based)	2,709,318	-1.1%
Indirect (Scope 2) emissions (market-based)	2,675,836	-4.2%
Total corporate (Scope 1 and 2) emissions (location-based)	4,949,855	-1.6%
Total corporate (Scope 1 and 2) emissions (market-based)	4,916,373	-3.3%
Indirect (Scope 3) emissions ⁹	110,249,834	-
Purchased Goods & Services	60,715,351	-
Capital Goods	583,108	-
Fuel & Energy Emissions	761,194	-
Upstream Transportation & Distribution	2,053,859	-
Waste from Operations	345,837	-
Business Travel	27,952	-
Employee Commuting	597,923	-
Processing of Sold Products	5,286	-
Use of Sold Products	40,775,781	-
End-of-Life Treatment of Sold Products	4,348,119	-
Investments	35,424	-

^{7.} We used the GHG Protocol Corporate Accounting Standard, the Operational Control approach and Global Warming Potentials from the IPCC Fifth Assessment Report (AR5 - 100 year). The base year for our footprint is 2006, when we first started measuring it

^{8.} Scope 1 and 2 emissions reflect CO₂, CH₄, N₂O and HFC gases. Details are disclosed in our CDP Climate response. Offsets were not used in our calculations

^{9.} Scope 3 emissions reflect all categories relevant to Kroger. Due to changes in calculation methodologies in 2024, we are not providing a change-over-previous-year calculation for 2024 vs. 2021 (baseline year)

This Responsible Business Report does not cover all information about our business, and inclusion of information herein is not an indication that the subject or information is material to Kroger's business or operating results for purposes of U.S. securities laws and regulations. Statements other than statements of historical or current facts, including statements and images about our Responsible Business targets, goals, aspirations, commitments and programs, and other business plans, initiatives and objectives are forward-looking statements and are based on Kroger's management's current assumptions and expectations. These statements are typically accompanied by the words "aim," "ambition," "anticipate," "approach," "believe," "commitment/ committed," "continue," "estimate," "expect," "expectation," "framework," "focus," "future," "goals," "may," "on track," "plan," "program," "strategy," "strive," "targets," "will" or other similar words. All such statements are intended to enjoy the protection of the safe harbor for forward-looking statements within the meaning of Section 21E of the Securities Exchange Act of 1934, as amended. Our actual future results, including the achievement of our targets, goals or commitments, could differ materially from our projected results as the result of a variety of factors, including, but not limited to, changes in circumstances, assumptions not being realized, or other risks, uncertainties, and factors, many of which are outside of our control.

Such risks, uncertainties and factors include the risk factors discussed in Item 1A of our most recent Report on Form 10-K and in subsequent filings with the Securities and Exchange Commission (SEC); they also include the challenges, assumptions and dependencies identified in this report. We urge you to consider all of the risks, uncertainties and factors identified above or discussed in this report carefully in evaluating the forward-looking statements herein. Kroger cannot assure you that the results reflected or implied by any forwardlooking statement will be realized or, even if substantially realized, that those results will have the forecasted or expected consequences and effects. Unless expressly stated otherwise, the forward-looking statements in this report are made as of the effective date identified herein, and we undertake no obligation to update or revise these forward-looking statements to reflect subsequent events or circumstances. Standards of measurement and performance made in reference to the goals, aspirations and objectives referred to in this report are developing and based on protocols, processes and assumptions that continue to evolve and are subject to change in the future, and no assurances can be given that any plan, initiative, projection, goal, commitment, expectation or prospect set forth in this report can or will be achieved.