

## **SAFEWAY INC.**

### **PARTICIPATION IN THE POLITICAL PROCESS**

Safeway Inc. is actively engaged in the political process and, in particular, seeks to shape public policy issues that can affect our business and impact our stockholders and employees. We believe it is the Company's fundamental right and responsibility to participate in the political process. At the same time, Safeway is committed to conducting its political activities in accordance with the highest standards of ethics and in full compliance with all laws and regulations covering corporate political activities.

Safeway's political activities include engaging in public policy discussions, lobbying government agencies and officials, and participating in trade associations and other advocacy organizations. Where permitted by law, and primarily in areas where the company has business operations, Safeway makes bipartisan political contributions to candidates, elected officials, political organizations and political parties. Strict guidelines and a Company-wide compliance system are in place to ensure adherence to all federal, state and local laws regulating lobbying activities and political contributions.

Safeway's Political Action Committee (SafePAC), supported entirely by voluntary contributions from eligible Safeway employees, also makes bipartisan contributions to candidates for federal and certain state offices, consistent with applicable laws. SafePAC contributions are based on a simple belief that it is important to support political leaders who understand Safeway's business structure and interests. Contributions made by SafePAC can be viewed at [www.fec.gov](http://www.fec.gov).