September 17, 2025

Subject: Updated Compliance Deadline - Albertsons Companies Traceability Requirements

Dear Valued Albertsons Companies Supplier:

In December 2024, Albertsons Companies ("Albertsons") communicated our company's traceability requirements in preparation for the FDA's Food Traceability Rule ("Traceability Rule"). Since then, the FDA has extended the compliance deadline for the Traceability Rule to July 20, 2028. Accordingly, we are extending our own deadline for our previously communicated requirements ("Albertsons Traceability Requirements").

New Compliance Deadline: January 1, 2027

The compliance date for the Albertsons Traceability Requirements is extended from June 30, 2025, to January 1, 2027. All suppliers must meet the Albertsons Traceability Requirements by this date. Please note, Albertsons does not plan to offer additional deadline extensions. Failure to comply may result in business disruption or termination.

Prepare Early – Transmit Your ASN /Shipping and Billing Notice If Capable

If your organization is currently able to transmit an Advance Shipment Notice (ASN), or for DSD suppliers a Shipment and Billing Notice, in each case per our specifications (see below), please notify **ECREDI@albertsons.com** for further instructions. Early transmittal allows us to address any technical issues together and ensures readiness by the January 1, 2027 deadline. Early transmission also helps streamline receiving and reduce payment delays. Suppliers who proactively transmit ASNs demonstrate operational maturity, positioning themselves as preferred partners in our network.

Delivering To	Type	Specification
Warehouse/Distribution Center	EDI ASN 856	ACI 856 Warehouse DC Spec
Self-Manufacturing Facility (Ingredient Suppliers)	EDI ASN 856	Attached as Exhibit A (Ingredient Suppliers only)
Direct Store Delivery (DSD)	EDI ASN 856 OR EDI 857 Shipment and Billing Notice	ACI 856 DSD Spec ACI 857 DSD Spec

No Changes to Albertsons Traceability Requirements

Albertsons' Traceability Requirements remain unchanged from the initial communication and are included as an attachment for your reference. You'll also find an updated FAQ document with additional guidance and links to helpful resources, reflecting common questions from our supplier community.

We value our partnership and are committed to supporting a smooth, collaborative transition. If you have any questions, please reach out to the Albertsons Food Traceability Team at FoodTraceability@albertsons.com.

Sincerely,

Michelle Larson
EVP, Chief Merchandizing Officer

Evan Rainwater
EVP, Chief Supply Chain Officer

ALBERTSONS COMPANIES TRACEABILITY REQUIREMENTS

Effective January 01, 2027, for all food products (including ingredients for manufacturing) shipped and delivered to any Albertsons location, we require you to transmit the following information to address the required FSMA 204 and Albertsons data elements.

Note: Suppliers of products (not ingredients) for Albertsons private label portfolio ("Own Brands Suppliers") may be subject to additional requirements. See Own Brands Product Dating and Coding SOP.

Information	Description	Required Data Elements
Advanced Ship Notice (ASN)	**All Non-DSD Suppliers**: Transmit an Electronic Data Exchange (EDI) 856 ASN for all shipments **DSD Suppliers:** For direct store deliveries, transmit either an EDI 856 ASN OR an EDI 857 Shipment and Billing Notice	• **Traceability Lot Code** • **Traceability Lot Code Source** (physical address where the traceability lot code was assigned, including business name, phone number and full address) **OR** Traceability Lot Code Source Reference (such as Global Location Number "GLN" or DUNS number that references where the traceability lot code was assigned **if** that data is maintained and up to date by your company with GS1 and/or DUNS) • **GTIN** • **Quantity Shipped** • **Date of Shipment** • **Ship From Location Identifier** (Address or GLN) • **Ship To Location Identifier** (Address or GLN) • **PO Number or Invoice Number** • **Bill of Lading Number** • **Lot/Batch Code** • **Product Date** - As appropriate (E.G. Expiration or Harvest/Pack Date for produce) • **Pallet SSCC Barcode Number(s)**
Labeling-Pallets	Pallet labels must include a GS1 US Serial Shipping Container Code (SSCC) barcode that is linked to the ASN. The SSCC on the pallet must match the SSCC on your ASN.	• **SSCC**

Labelling-Cases	Case labels must include a GS1-128 barcode with a Global Trade Item Number (GTIN) registered to the manufacturer and the following GS1 Application Identifiers:
	10 - Batch/Lot Number
	13 - Packed On Date or
	17 - Expiration Date
	
	The use of additional GS1 AI is optional. *
	
	*Suppliers of Albertsons private label products (Own Brands Suppliers) are required to use additional GS1 Application Identifiers. Please refer to the Own Brands Product Dating and Coding SOP for more detail.
		• **GTIN**
		• **Lot Number** (AI 10) *
		• **Date Reference** as appropriate for the product
		  ○ Pack Date (AI 13) or
		  ○ Expiration Date (AI 17)

Reference Documents	A reference document must be included for every shipment/ delivery. Examples include • Bills of Lading • Shipping Manifests • Packing Lists • Store Invoices (For Direct to Store Deliveries) ➢ **Note:** See here for an example from the FDA of How an Invoice or BOL Could Be Used to Record Key Data Elements	• **Shipment or Invoice Date** • **PO or Invoice Number** • **Supplier Name and Contact Info.** • **Ship From Location Identifier** (Address or GLN) • **Ship To Location Identifier** (Address or GLN) • **GTIN** • **Quantity Shipped/Delivered** • **Unit of Measure** (cases, pounds etc.) • **Traceability Lot Code** (must match ASN) • **Traceability Lot Code Source** (physical address where the traceability lot code was assigned, including business name, phone number and full address) OR Traceability Lod Code Source Reference (such as Global Location Number "GLN" or DUNS number that references where the traceability lot code was assigned **if** that data is maintained and up to date by your company with GS1 and/or DUNS)

FREQUENTLY ASKED QUESTIONS

DISCLAIMER: This document is intended for informational purposes only and should not be construed as legal advice. Albertsons Companies does not provide legal guidance to suppliers. Suppliers are encouraged to consult their own legal counsel to ensure compliance.

Meeting the requirements of the Traceability Rule is a collective responsibility between Albertsons Companies and our suppliers.

These FAQs and links to additional resources aim to help suppliers understand and meet our traceability requirements for ALL food and non-alcoholic beverages supplied to any Albertsons location.

This document is for guidance purposes only and should not be considered legal advice. Suppliers should seek their own legal counsel on how to comply with all laws and regulations applicable to products supplied to Albertsons. For more information on the Traceability Rule, please refer to FDA's FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods and FDA's FAQ on the FSMA Food Traceability Rule.

General Questions- Scope of Requirements, Applicability and Deadline

1. Do Albertsons traceability requirements apply to all food and non-alcoholic beverage suppliers?

Yes, our traceability requirements apply to all suppliers that supply Albertsons with food and non-alcoholic beverages, including:

- Suppliers who ship to our distribution centers and warehouses
- OWN Brands suppliers, including suppliers of ingredients to our manufacturing facilities
- DSD suppliers (which includes cross docking deliveries); and
- Suppliers who ship/deliver to our retail central kitchens and satellite stores

2. Why does Albertsons request additional traceability data for ALL food and non-alcoholic beverage products and not just foods on the Food Traceability List?

Requiring the FSMA 204 traceability requirements for all food and non-alcoholic beverage products will help us to work toward ensuring a safer food supply chain for our valued customers. Further, considering that the FDA indicates the Food Traceability List (FTL) can expand, we see value in taking a more proactive approach now to avoid continuous changes for Albertsons and our suppliers as the Traceability Rule evolves.

3. **What if I qualify for a full or partial exemption under the Traceability Rule?**

We recognize the Traceability Rule provides for certain full or partial exemptions. However, because Albertsons is requesting the required data elements for all foods and non-alcoholic beverages, not just those on the FTL, there are no exceptions to Albertsons' traceability requirements.

4. **I supply pet food to Albertsons, do the Albertsons traceability requirements outlined in this letter apply to me?**

No, food for animals is not in scope as either part of the FDA FTL or Albertson's expanded scope for all human foods and non-alcoholic beverages.

5. **I supply my products/ingredients to Albertsons through a distributor, do the Albertsons Traceability Requirements still apply to me?**

Yes. Even if you do not ship directly to Albertsons, our traceability requirements still apply to your products. You are responsible for providing all required traceability data in an EDI ASN to your distributor. The distributor must transmit the ASN to Albertsons, but the traceability responsibility begins with you.

6. **I supply ingredients for manufacturing to Albertsons plants, not retail stores or distribution centers. Do the Albertsons Traceability Requirements still apply to me?**

Yes. Albertsons' traceability requirements apply to all food and non-alcoholic beverages. This includes any food ingredients that are provided to Albertsons manufacturing plants, not just finished consumer packaged goods.

7. **When do I need to comply with Albertsons' traceability requirements?**

We encourage you to start sharing the required traceability data elements as soon as possible to ensure a smooth transition, but all suppliers must comply no later than **January 1, 2027**. If your organization is currently able to transmit an Advance Shipment Notice (ASN), or for DSD suppliers a Shipment and Billing Notice, in each case per our specifications, please notify ECREDI@albertsons.com for further instructions.

8. **What if I do not comply with Albertsons' deadline?**

If you are unable to, or elect not to, comply by the January 1, 2027, deadline, Albertsons may be forced to reevaluate our business relationship with you. Failure to comply with the Traceability Rule compliance date set by the FDA may result in FDA enforcement action.

9. I am an Own Brands Supplier, do the Traceability Data Element Requirements replace existing requirements for sharing data?

No. Own Brands suppliers are still required to adhere to Albertsons' labeling and packaging requirements for Own Brands suppliers found at the OB Supplier Central in the Own Brands Product Dating and Coding SOP.

Questions about GS1 Standards and Required Traceability Rule Elements

10. What is GS1, and why are we asking our suppliers to use it for food traceability?

GS1 is a global organization that develops and maintains standards for business communication, including the unique identification of products, locations, and logistics data. To learn more about GS1 and its global standards, visit the official GS1 website.

To help you understand how GS1 standards can support implementation of the Traceability Rule visit:

- Retail Grocery and Foodservice Applications of GS1 Standards to Support FSMA 204
- GS1 Standards for FSMA 204 – YouTube video
- How GS1 Standards Support Product Tracing, Critical Tracking Events and Key Data Elements

11. I don't currently use GS1 standards in my shipping process, can I provide the required data another way?

No. To ensure smooth communication across the supply chain, we require suppliers to use GS1 standards to identify, capture, and share traceability data. These standards support consistent product tracking and comply with the FDA's Food Traceability Rule.

Additionally, many retailers, distributors, and foodservice companies now require GS1 standards as part of their traceability and inventory systems. Aligning with GS1 not only ensures compliance, but it also strengthens your partnerships and keeps your operations compatible with industry expectations.

12. How can I learn more about and get a GS1 barcode, GTIN, and SSCC?

To get started with GS1 standards and obtain the necessary identifiers and barcodes, here are some helpful resources:

- **Learn the basics:** The GS1 General Specifications document is the foundational guide to GS1 standards, including barcodes, GTINs, and SSCCs.
- **GS1-128 Barcode & GTIN:**
  - What is a GS1-128 Barcode?: Understand how this barcode supports traceability and logistics.

- ❖ How to Create a GTIN: Step-by-step instructions for generating a Global Trade Item Number.
- ❖ Get a Barcode/GTIN: Official GS1 portal to license and manage your GTINs.

➢ **SSCC (Serial Shipping Container Code):**

- ❖ About the SSCC – Learn how SSCCs uniquely identify logistic units like pallets and cases.

13. I am not familiar with the required data elements "Traceability Lot Code" and "Traceability Lot Code Source," what are these?

➢ **Traceability Lot Code (TLC):** A Traceability Lot Code is an alphanumeric identifier used to uniquely tag a specific traceability lot in a company's records. It's similar to what businesses usually call a "lot" or "batch code." You have flexibility in how the code is created. For consistency, it's recommended to use GTIN + lot code (usually 12–20 characters long), following the GS1 US standard. Other formats, like batch codes or production codes, can also be used, as long as they meet the definition of a traceability lot code under FDA's Traceability Rule.

➢ **Traceability Lot Code Source & Source Reference**: This refers to the physical location where the traceability lot code was assigned to the food. You can provide this source in one of two ways:

1) Contact Info: Include the facility's address and phone number where the lot code was generated; *OR*
2) Reference Identifier: Use a DUNs number or GS1 Global Location Number (GLN) to identify the location **if** your company maintains that data with the relevant data source (GS1 or DUNS).

This second option is known as the Traceability Lot Code Source Reference.
For further examples and guidance, check out the FDA's Traceability Lot Code Source Guidance.

14. We source products internationally. What if our overseas partners do not have GLNs or DUNS numbers?

If the Traceability Lot Code Source cannot provide a GLN or DUNS, the physical address must be included in ASNs and reference documents. All shipments must trace back to the location where the lot code was assigned, regardless of geography.

15. For produce, instead of using the GS1 Application Identifier for pack date can a Julian date be used instead?

Yes, a Julian date may be used as a Pack Date [AI (13)] if it accurately reflects the production date and is consistently applied across data carriers (i.e. ASN, GS1-128, Bill of Lading, etc.).

Questions about the Labeling Requirements

16. Is there a specific size or placement requirement for the GS1-128 barcode on cases or SSCC pallet labels?

No, there is no fixed size or placement requirement for these labels. However, the labels must be sized and positioned to ensure reliable scanning throughout the supply chain. This means:

- The barcode should be large enough to be easily read by standard scanners.
- It must be placed on a flat, unobstructed surface.
- Avoid placing it near seams, folds, or corners.
- For pallets, GS1 recommends placing the label 16–32 inches from the base and at least 2 inches from the vertical edge, ideally on the upper right half of the pallet face.

For pallets it is recommended that two sides of the item are labelled with the exact same data, to ensure one label is always visible (e.g. pallets that are stored either long or short edge facing).

17. The cases I supply are sold as full retail units and are small, am I required to apply a GS1-128 barcode label to each case?

If your cases are sold as full units at retail (e.g. cases of bundled water) and are shipped exclusively on pallets, then yes—pallet-level SSCC labeling may be acceptable in lieu of individual case labels, provided the following conditions are met:

- The pallet is treated as the logistic unit for traceability purposes,
- The SSCC label on the pallet includes all required FSMA 204 Key Data Elements (KDEs), and
- The cases are not separated or sold individually at any point in the supply chain.

18. We don't ship pallets—we supply retail-ready displays. Do your labeling requirements still apply to us?

Yes. Retail-ready displays are considered logistic units under GS1 standards and FSMA 204 guidance. Even though retail-ready displays differ from traditional pallets, they are still subject to traceability labeling requirements because they are shipped, stored, and received as a single unit.

If your display is pre-packed and shipped as a consolidated unit, it must be labeled and documented according to the pallet labeling requirements contained in the attached letter.

While pallet labels are expected to be placed on two adjacent sides, retail-ready displays may only require one visible label—as long as they're easily scannable and unobstructed during receiving.

19. As an importer or aggregator, on the required labels can I use a GTIN that identifies my company rather than the original manufacturer of the product or ingredient?

No. The GTIN must be linked to the entity that actually manufactured or processed the product or ingredient being supplied. Using a GTIN that identifies only the importer or aggregator—without referencing the manufacturing or processing source—does not meet traceability requirements.

This linkage is required because the GTIN serves as a product identifier that must be traceable to the Traceability Lot Code Source, which is the location where the lot code was assigned. If the GTIN does not reflect the actual producing entity, it breaks the traceability chain and may result in non-compliance.

Importers must work with their upstream suppliers to ensure that:

- The GTIN listed on the ASN and labeling reflects the actual manufacturer or processor.
- All traceability data elements (e.g., lot code, source location) are accurately captured and transmitted.

If you aggregate supply from multiple producers, each product must retain its original GTIN and associated traceability data. Reassigning or substituting GTINs is not permitted.

Questions Specific to DSD Suppliers

20. What is a DSD Supplier?

A DSD supplier is a vendor that uses Direct Store Delivery (DSD) as its distribution method, meaning they deliver products directly to our retail stores or satellite kitchens. If you deliver to an Albertsons distribution center or warehouse you are NOT a DSD supplier.

21. Do the Albertsons Traceability Requirements contained in this letter apply to DSD suppliers?

Yes, our traceability requirements apply to all suppliers regardless of the method of distribution.

22. Do DSD Suppliers need to include pallet-level SSCC barcodes if we only deliver individual cases?

No. SSCCs are typically used for palletized shipments where the pallet functions as a single traceable unit. DSD suppliers delivering individual cases directly to stores are only required to ensure each case has a GS1-128 barcode with the required data elements.

23. As a DSD Supplier, am I required to submit an ASN?

Yes. All DSD suppliers are required to submit ASNs via EDI. You must transmit either an EDI 856 ASN or EDI 857 Shipping and Billing Notice or all store deliveries. This requirement supports compliance with FSMA 204 and ensures traceability and operational visibility across our supply chain.

24. Are suppliers delivering via DSD cross dock required to submit an ASN?

Yes. DSD cross dock shipments still require an EDI 856 ASN or EDI 857 Shipping and Billing Notice. Even though cross dock items move through a distribution center, the ASN transmission (or Shipping and Billing Notice) is critical to reconcile item, quantity, lot code and other Key Data Elements at store receiving.

I Have Read All of the FAQ's And Still Have Questions

We understand that these new requirements may raise some questions and concerns, and we are committed to working with you to understand our new requirements. For any questions not addressed here or in the suggested resources, please contact the dedicated Albertsons Companies Food Traceability Team at FoodTraceability@albertsons.com.