MEMORANDUM

** INTERNAL USE ONLY **

To: Board of Directors, Executive From: Dennis Dunne

Officers and certain key employees

Date: August 31, 2011

Location: Corporate Accounting

Pleasanton

2012 Calendar for Earnings Releases, 10-Qs and 10-K

Year-end 2011

Year ends December 31, 2011

Earnings release February 23, 2012 (Thursday)

Trading window for executive officers,

directors and other insiders (Note 1)

February 27 through March 16, 2012

10-K due February 29, 2012 (60th day)

First Quarter 2012

Quarter ends March 24, 2012

Earnings release April 26, 2012 (Thursday)

Trading window for executive officers, directors and other insiders (Notes 1 & 2)

April 30, 2012 through May 18, 2012

10-Q due May 3, 2012 (40th day)

Second Quarter 2012

Quarter ends June 16, 2012

Earnings release July 19, 2012 (Thursday)

Trading window for executive officers, directors and other insiders (Note 1)

July 23 through August 10, 2012

10-Q due July 26, 2012 (40th day)

Third Quarter 2012

Quarter ends September 8, 2012

Earnings release October 11, 2012 (Thursday)

Trading window for executive officers, October 15 through November 9, 2012

directors and other insiders (Note 1)

10-Q due October 18, 2012 (40th day)

Year-end 2012

Year ends December 29, 2012

Earnings release February 21, 2013 (Thursday)

Trading window for executive officers, February 25 through March 15, 2013

directors and other insiders (Note 1)

10-K due February 27, 2013 (60th day)

Note 1: Company policy prohibits the board of directors, executive officers and certain key employees (including all Retail Division Managers, VPs Finance, directors and vice presidents of sale and Roms), from purchasing or selling Safeway stock outside of the 15-trading day window period beginning two trading days after the earnings release for each of the first, second and fourth fiscal quarters, and the 20-trading day window period beginning two trading days after the earnings release for the third fiscal quarter. In addition, all transactions in company stock by these individuals, even those within the window period, must be pre-cleared with the General Counsel (Bob Gordon, 925/467-3858) or the Compliance Officer (Laura Donald, 925/469-7586).

Note 2: In 2009 and 2010 the opening of the first quarter trading window was delayed (and, consequently, the trading window period was shortened) until earnings guidance was publicly announced. A similar delay to the opening of the first quarter 2011 trading window is reasonably possible.