

RITE AID CORPORATION

INSIDE INFORMATION POLICY AND TRADING RESTRICTIONS

Statement of Policy Regarding Transactions in Securities

It is the policy of Rite Aid Corporation (“Rite Aid” or the “Company”) that no director, officer or other associate of Rite Aid who is aware of material nonpublic information relating to Rite Aid may, directly or through family members or other persons or entities (each, an “Insider”): (a) buy or sell securities of Rite Aid (other than pursuant to a pre-approved trading plan that complies with SEC Rule 10b5-1) or engage in any other action to take personal advantage of that information; or (b) pass that information on to, or “tip,” others outside Rite Aid, including family and friends, who may trade or advise another to trade on the basis of such information. In addition, it is the policy of Rite Aid that no Insider of Rite Aid who, in the course of working for Rite Aid, learns of material nonpublic information about a company with which Rite Aid does business, including a customer or supplier of Rite Aid, may trade in that company’s securities until the information becomes public or is no longer material.

Transactions that may be necessary or justifiable for independent reasons (such as the need to raise money for an emergency expenditure) **are not exceptions** to this Policy Statement. The securities laws do not recognize such mitigating circumstances, and, in any event, even the appearance of an improper transaction must be avoided to preserve Rite Aid’s reputation for adhering to the highest standards of conduct.

Material Information

Material information is any information that a reasonable investor would consider important in making a decision to buy, hold or sell securities. Any information that could be expected to affect Rite Aid’s stock price, whether it is positive or negative, should be considered material. Some examples of information that ordinarily would be regarded as material are:

- Projections of future earnings or losses, or other earnings guidance;
- Earnings that are inconsistent with the consensus expectations of the investment community;
- A pending or proposed merger, acquisition or tender offer;
- A pending or proposed acquisition or disposition of a significant asset;
- A change in top management;
- The gain or loss of significant suppliers or contracts;
- A cybersecurity incident or risk that may adversely impact the Company’s business, reputation or share value;
- The commencement, status or results of important litigation;
- A planned securities offering.

Twenty-Twenty Hindsight

Remember, anyone scrutinizing your transactions will be doing so after the fact with the benefit of hindsight. As a practical matter, before engaging in any transaction, you should carefully consider how enforcement authorities and others might view the transaction in hindsight.

When Information is “Public”

If you are aware of material nonpublic information, you may not trade until the information has been disclosed broadly to the marketplace (such as by a press release or an SEC filing) and the investing public has had time to absorb the information fully. To avoid the appearance of impropriety, as a general rule, information should not be considered fully absorbed by the marketplace until 24 hours after the information is released. If, for example, Rite Aid were to make an announcement before the stock market opens on a Thursday, you should not trade in Rite Aid securities until the following Monday.

Blackout Periods

Trading in Rite Aid securities by any member of the Board of Directors, any individual who has the position of Group Vice President or higher and certain other designated individuals is prohibited during the Company's blackout periods. The Company has established four (4) routine quarterly blackout periods (“Quarterly Blackout Periods”). Each Quarterly Blackout Period begins after the 5th day of the last month of the quarter and ends 24 hours after the Company's quarterly (or annual) earnings are released.

In addition to Quarterly Blackout Periods, the Company may, from time to time, impose other blackout periods upon notice to those persons who are affected. The Quarterly Blackout Periods apply whether or not a reminder notice of the blackout is sent out. You are responsible for compliance with this Policy Statement. Each quarter, a reminder will be sent out before the trading window opens to each person who is subject to the Quarterly Blackout Periods.

Transactions by Family Members

This Policy Statement also applies to your family members who reside with you, anyone else who lives in your household, and any family members who do not live in your household but whose transactions in Rite Aid securities are directed by you or are subject to your influence or control (such as parents or children who consult with you before they trade in Rite Aid securities). You are responsible for the transactions of these other persons and, therefore, should make them aware of the need to confer with you before they trade in Rite Aid securities.

Gifts

Bona fide gifts of securities are not transactions subject to this Policy Statement, unless the person making the gift has reason to believe that the recipient intends to sell the Company securities while the Insider is aware of material nonpublic information or subject to a blackout period (in which case pre-clearance is required). Gifts of securities may include gifts to trusts for estate planning purposes, as well as donations to a charitable organization. Whether a gift is “bona fide” may depend on various circumstances surrounding the gift. Accordingly, you are encouraged to consult the General Counsel when contemplating a gift.

Transactions Under Rite Aid Equity Plans

This Policy Statement **does not** apply to the exercise of an employee stock option, or to the exercise of a tax withholding right pursuant to which you elect to have Rite Aid withhold shares subject to an option or restricted stock to satisfy tax withholding requirements. This Policy Statement **does** apply, however, to any sale of stock as part of a broker assisted cashless exercise of an option or any other market sale for the purpose of generating the cash needed to pay the exercise price of an option.

Employee Stock Purchase Plan

This Policy Statement **does not** apply to purchases of Rite Aid stock from Rite Aid in the employee stock purchase plan resulting from your periodic contribution of money to the plan pursuant to the election you made at the time of your enrollment in the plan. This Policy Statement **does** apply to your sales of Rite Aid stock purchased pursuant to the plan.

Company Approval of Rule 10b5-1 Plans

Rite Aid does not want to impede your ability to engage in sales of company stock (e.g., for financial and estate planning purposes). However, in order to reduce the risk of litigation and negative press, and to preserve the reputation of Rite Aid and our associates, this will serve to clarify certain procedural requirements that are essentially an extension of Rite Aid's current pre-clearance procedure for transactions in Rite Aid stock, as set forth below under "Pre-Clearance Procedures."

Rite Aid's General Counsel must pre-approve on behalf of Rite Aid any plan, arrangement or trading instructions, etc., involving potential sales (or purchases) of stock or option exercises and sales, etc., including, but not limited to, establishment of a pre-arranged written trading plan pursuant to SEC Rule 10b5-1 (a "Rule 10b5-1 Plan"), which provides an affirmative defense against insider trading liability if the plan was adopted in good faith when the Insider was not in possession of material nonpublic information and complies with the requirements of Rule 10b5-1.

You must still adhere to this prior approval procedure even where, for example, you are assured that a major law firm has approved the trading arrangement that a brokerage firm or bank may be suggesting. (Note that the actual transactions effected pursuant to a pre-approved Rule 10b5-1 Plan will not be subject to Rite Aid's pre-clearance procedures for transactions in Rite Aid stock.)

In reviewing and approving a Rule 10b5-1 Plan, the following guidelines apply to all Insiders:

- A. **Avoid Modifications and Terminations.** Modifications and terminations of the Plans should be minimal and infrequent, if at all. Modifications, while not prohibited, may only be made with the prior written approval of Rite Aid.
- B. **Avoid Multiple Plans.** Insiders should not have multiple, overlapping plans in place.

In addition, the following guidelines apply to Rule 10b5-1 Plans adopted by executive officers or directors:

- A. Publicly Disclose New Plans. To help prevent unnecessary stockholder scrutiny or litigation, Rite Aid will make a public disclosure each time an executive officer or director of Rite Aid (“Insider”) adopts a new Rule 10b5-1 Plan. Investors are less likely to react negatively to stock sales if they know in advance about an Insider’s Plan. There is no need to provide the details of the Plan.
- B. Waiting Period for Plan Transactions. We recommend the Plans have an effective date at least fifty (50) days after the Plan is adopted. This minimizes the risk of adverse publicity and also should help combat any “good faith” challenge to the Plan. After all, a Plan is only effective if it is adopted while the Insider does not possess material nonpublic information. The Insider’s defense against a potential insider trading liability is strengthened if some time passes before the first sales are made.
- C. Report Rule 10b5-1 Plan Sales on Form 4s. Officers and directors must file Form 4s reporting transactions in Rite Aid securities within two business days of the reportable transaction. Form 4s for sales made under a Rule 10b5-1 Plan will specifically note that the sales were made pursuant to the Plan. That way, investors or analysts monitoring stock sales by Insiders will know the sales were made under a previously established trading plan, and do not represent a current investment decision by the Insider. Rule 10b5-1 Plans should also provide for prompt notification to Rite Aid of all transactions executed under the Plan in order to facilitate timely Section 16 reporting within the two business day deadline.

Additional Prohibited Transactions

Rite Aid considers it improper and inappropriate for any Insider of Rite Aid to engage in short-term or speculative transactions in Rite Aid securities. It, therefore, is Rite Aid’s policy that Insiders may not engage in any of the following transactions:

- A. Short Sales: Short sales of Rite Aid securities evidence an expectation on the part of the seller that the securities will decline in value and, therefore, signal to the market that the seller has no confidence in Rite Aid or its short-term prospects. In addition, short sales may reduce the seller’s incentive to improve Rite Aid’s performance. For these reasons, short sales of Rite Aid securities are prohibited by this Policy Statement. In addition, Section 16(c) of the Securities Exchange Act of 1934, as amended (the “Exchange Act”), prohibits directors and officers from engaging in short sales.
- B. Publicly Traded Options: A transaction in options is, in effect, a bet on the short-term movement of Rite Aid’s stock and therefore creates the appearance that the director, officer or other associate is trading based on inside information. Transactions in options also may focus the Insider’s attention on short-term performance at the expense of Rite Aid’s long-term objectives. Accordingly, transactions in puts, calls or other derivative securities on an exchange or in any other organized market are prohibited by this Policy Statement.

- C. Hedging Transactions: Hedging or monetization transactions, such as zero-cost collars, equity swaps, exchange funds and forward sale contracts, allow an Insider to lock in much of the value of his or her stock holdings, often in exchange for all or part of the potential for upside appreciation in the stock. These transactions are designed to hedge or offset, any decrease in the market value of Company securities and allow the Insider to continue to own the covered securities, but without the full risks and rewards of ownership. When that occurs, the Insider may no longer have the same objectives as Rite Aid's other stockholders. Therefore, these types of transactions are prohibited by this Policy Statement.
- D. Margin Accounts and Pledged Securities. Securities held in a margin account as collateral for a margin loan may be sold by the broker without the customer's consent if the customer fails to meet a margin call. Similarly, securities pledged (or hypothecated) as collateral for a loan may be sold in foreclosure if the borrower defaults on the loan. Because a margin sale or foreclosure sale may occur at a time when the pledger is aware of material nonpublic information or otherwise is not permitted to trade in company securities, directors, officers and other employees are prohibited from holding company securities in a margin account or otherwise pledging company securities as collateral for a loan. (Pledges of company securities arising from certain types of hedging transactions are governed by the paragraph above captioned "Hedging Transactions".)

Pre-Clearance Procedures

All members of the Board of Directors and all individuals who have the position of Group Vice President or higher must obtain pre-clearance from Rite Aid's General Counsel] of any transaction involving Rite Aid securities (including the exercise of stock options, gifts, loans, contributions to a trust or any other transfers) prior to entering into such transactions. Each proposed transaction will be evaluated to determine if it raises insider trading concerns or other concerns under federal laws and regulations. Any advice will relate solely to the restraints imposed by law and will not constitute advice regarding the investment aspects of any transaction. Clearance of a transaction must be re-requested if the transaction order is not placed within 48 hours of obtaining pre-clearance. If clearance is denied, the fact of such denial must be kept confidential by the person requesting such clearance.

When requesting pre-clearance, the requestor should carefully consider whether he or she may be aware of any material nonpublic information about the Company, and should describe fully those circumstances to the General Counsel. A requestor who is a director or executive officer should also indicate whether he or she has effected any non-exempt "opposite-way" transactions within the past six months, and should be prepared to report the proposed transaction on an appropriate Form 4 or 5, if applicable. The requestor should also be prepared to comply with SEC Rule 144 and file a Form 144, if advisable, at the time of any sale.

Additional Information - Directors and Executive Officers

Directors and executive officers of the Company and certain other persons identified by the Company from time to time must also comply with the reporting obligations and may become subject to potential short-swing profit liability for certain transactions pursuant Section 16 of the Exchange Act. The practical effect of these provisions is that executive officers, directors and such other persons who purchase and sell (or vice versa) the Company's securities within a six (6) month period must disgorge all short-swing profits to the Company, unless exempted under

Section 16(b), regardless of whether they had knowledge of any material nonpublic information. Under these provisions, and so long as certain other criteria are met, neither the receipt of an option under the Company's option plans, nor the exercise of that option is deemed a purchase under Section 16; however, the subsequent sale of any such shares is a sale under Section 16. In addition, the receipt of restricted stock under the Company's Omnibus Equity Plans are not deemed a purchase under Section 16, but the subsequent sale of such stock is not exempt from Section 16. Section 16 (as well as this Policy) prohibits executive officers and directors from ever making a short sale of the Company's stock or effecting transactions in put and call options. A short sale is a sale of securities not owned by the seller or, if owned, not delivered.

Post Termination Transactions

The Policy Statement continues to apply to your transactions in Rite Aid securities even after you have terminated employment or relationship with the Rite Aid. If you are in possession of material nonpublic information when your employment or relationship terminates, you may not trade in Rite Aid securities until that information has become public or is no longer material.

Any person who has a question about this Policy Statement or its application to any proposed transaction may obtain additional guidance from:

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Ultimately, however, the responsibility for adhering to this Policy Statement and avoiding unlawful transactions rests with each individual.