NO PURCHASE OR PAYMENT OF ANY KIND IS NECESSARY TO ENTER OR WIN. A PURCHASE WILL NOT INCREASE YOUR CHANCES OF WINNING.

1. SPONSOR: TOPS Markets, LLC ("Sponsor" or "TOPS") is the official sponsor of the "TOPS Promotion" featuring MONOPOLY, inclusive of the "Instant Win" Game and "Online" Game (collectively referred to herein as the "Promotion").

2. ELIGIBILITY: The Promotion is open only to legal residents of New York, Pennsylvania and Vermont, ages 18 and over ("Eligible Entrants"). Business entities such as corporations or companies are not eligible to enter or win. Associates, officers and directors of the Sponsor, its retail stores, distribution centers and division offices, its subsidiaries and affiliates, franchisees, promotion suppliers, affiliated advertising agencies, third party contractors and spouses of the aforementioned groups (and the I.R.S. listed dependents or members of household including dependents in the military or attending college living away from home) are not eligible to win. A separate TOPS Associate Game will be occurring simultaneously, and Associates of TOPS and their eligible family members may participate in that game. This Promotion is void elsewhere and where prohibited by law. Promotion is subject to all applicable federal, state and local laws, rules, and regulations.

3. PROMOTION PERIOD: The Promotion begins at 12:00:00 a.m. on March 17, 2019 Eastern Daylight Savings Time (EDT) and ends at 11:59:59 p.m. EDT on June 8, 2019 or sooner if all Game Tickets (as defined below) are distributed before June 8, 2019 (the "Promotion Period"). The Sponsor's computer is the official timekeeping device for this Promotion.

4. HOW TO ENTER: There are two (2) ways to enter the Promotion. (A) To Enter by Qualifying Transaction: To participate in this Promotion, receive one (1) free game ticket ("Free Game Ticket") with each Qualifying Transaction (as defined below). Subject to certain exclusions listed below, a "Qualifying Transaction" is the purchase of any item by Eligible Entrants who use a registered TOPS BonusPlus[®] at any participating grocery store being operated as a "TOPS Friendly Market" by the Sponsor and/or its affiliates and franchisees ("TOPS Store") during the Promotion Period. Purchases made at the TOPSMarkets.com and Instacart.com websites and at TOPS fuel stations, convenience stores (including TOPS Xpress and TOPS Fresh Xpress locations), and in-store purchases made at a Tim Horton's franchise location shall not be considered made at a TOPS Store and do not constitute a Qualifying Transaction. Purchases that consist solely of merchandise or products prohibited by law from participating in a promotion (such as alcohol, tobacco, and/or certain milk and milk-related products in PA only), without the purchase of any other eligible merchandise or products included in the transaction and/or purchases that consist solely of gasoline and/or office services only, including but not limited to Western Union, wire transactions, money orders, postage stamps, lottery tickets, and/or utility bill transactions, without the purchase of any other eligible merchandise or products included in the transaction, shall not be considered a Qualifying Transaction. Sponsor will identify certain products sold at TOPS Stores that will be designated as a bonus game ticket item ("Bonus Game Ticket Item"). Eligible Entrants using their registered TOPS BonusPlus® who purchase a Bonus Game Ticket Item as part of a Qualifying Transaction will receive one (1) additional Game Ticket ("Bonus Game Ticket") for each Bonus Game Ticket Item purchased. Each Free Game Ticket and/or Bonus Game Ticket may be referred to herein individually as a "Game Ticket" and collectively as "Game Tickets". The Eligible Entrant's registered TOPS BonusPlus® must be scanned at the time of purchase in order to receive a Game Ticket. The total quantity of Game Tickets to be received during a Qualifying Transaction will be specified on your TOPS Store register receipt. Game Tickets will only be awarded at the time of the Qualifying Transaction in which they were earned. Eligible Entrants are limited to one Qualifying Transaction per six-hour period. TOPS reserves the right to limit the quantity of any item purchased (including but not limited to a Bonus Game Ticket

Item). Each Bonus Game Ticket Item will be specified by brand, size, flavor, style, etc. A complete list of each eligible Bonus Game Ticket Item will be available at the Customer Service Desk of each TOPS Store. A Bonus Game Ticket Item may be changed (variety and size), and new products added or products deleted during the course of the Promotion at the discretion of TOPS. As the Promotion progresses, a participating TOPS Store may run out of Game Tickets before another store and, for that TOPS Store, the Promotion is over. Eligible Entrants who return a Bonus Game Ticket Item for cash or credit and for which they received a Game Ticket may be required to return the unopened Game Ticket to remain eligible to win the Promotion. (B) To Enter without Purchase: To enter without purchase, while supplies last, Eligible Entrants must send a self-addressed, stamped return envelope (Vermont residents may omit return postage to Vermont addresses or, with proof of Vermont residency, to other addresses) to TOPS Promotion Ticket Request, Attn: Promotions Coordinator, P.O. Box 367, Kennesaw, GA 30156. Mail-in requests, including both outer envelope and self-addressed stamped envelope, must be handwritten and must be postmarked no sooner than March 17, 2019, and no later than June 8, 2019, and must be received by TOPS no later than June 14, 2019 ("Mail-in Request"). For each Mail-In Request received by Sponsor, Sponsor will return two (2) Game Tickets in the return envelope supplied, while supplies of Game Tickets last. To qualify as a Mail-in Request, each request must be sent in a separate stamped outer mailing envelope with the requestor's first and last name, street address, city, state and zip or postal code (name and address must match the return name and address on self-addressed stamped envelope) legibly handwritten in the upper left-hand corner of the outer envelope. Requests that are sent in preprinted envelopes, that utilize address labels or stickers, that are photocopied, hand-stamped, computer-generated or otherwise mechanically or digitally produced or reproduced, that are not mailed in separate outer stamped mailing envelopes or that otherwise fail to comply with these Official Rules or are received after supplies of available Game Tickets have been exhausted will not qualify as a Mail-in Request and will NOT be honored, acknowledged or returned and the persons submitting such requests will forfeit any corresponding postage and unused envelopes. By participating in this Promotion, all entrants agree to be bound by these Official Rules, and agree that the decisions of the Sponsor will be valid and binding in all respects. Sponsor is not responsible for late, stolen, lost, postage due, or misdirected mail, or for any Mail-in Request that is incomplete or illegible.

5. TO PLAY: (A) Instant Win Game: Game Tickets may include Instant Winner coupons redeemable for a \$25,000 Car (payable in cash), \$10,000 Cash, \$1,000 TOPS Grocery/Gas Gift Card, \$100 TOPS Grocery/Gas Gift Card, \$10 TOPS Grocery/Gas Gift Card, \$10 in Free Taste Bucks, one (1) Free Game offer for bowling at GoBowling.com (\$6.00 ARV), \$5 TOPS Grocery/Gas Gift Card, ten (10) 4 x 6 prints plus one (1) 5 x7 print from FreePrints.com (\$3.68 ARV), one (1) Classic Card from InkCards.com (\$2.00 ARV), one (1) Redbox Free Movie Rental (\$1.50 ARV), 50 Free TOPS GasPoints, Free Products or Two (2) Free Game Tickets that can be redeemed at participating TOPS Store, ("Instant Winner Prize"). (B) Second Chance Sweepstakes: Some Game Tickets may include a Second Chance Sweepstakes Entry Form which is the official entry form into a "Second Chance Sweepstakes" that will be conducted by the Sponsor. The "Second Chance Sweepstakes" will be held for any Instant Win \$25,000 Car (payable in cash) prizes that are not claimed with an Instant Win coupon by July 6, 2019; therefore, the total of number of prizes to be awarded in the Second Chance Sweepstakes may vary. The Sponsor will conduct a random "Second Chance Sweepstakes" drawing to award these prizes. If all of the ten (10) \$25,000 Car (payable in cash) Prizes have been awarded before July 6, 2019, one additional \$25,000 Car (payable in cash) will be awarded for this Second Chance Drawing. There will be 5,000,000 Official "Second Chance Sweepstakes" entry forms made available inside certain Game Tickets. Eligible Entrants who receive an Official "Second Chance Sweepstakes" entry form may enter the Second Chance Sweepstakes by completing and mailing one of the official

"Second Chance Sweepstakes" entry forms to: TOPS 2ND CHANCE SWEEPSTAKES, P.O. Box 440185, Kennesaw, GA 30160. Entries into the "Second Chance Sweepstakes" must be postmarked no sooner than March 17, 2019 and no later than July 6, 2019 to be eligible. The random "Second Chance Sweepstakes" drawings will be conducted on or about July 11, 2019 from among all Eligible Second Chance Sweepstakes entries. Entries must be received by July 10, 2019 to be eligible for the July 11, 2019 drawing. There is no limit to the number of "Second Chance Sweepstakes" entries an Eligible Entrant may mail in a single envelope (envelope must be no larger than a #10 standard business size envelope of 4-1/8" x 9-1/2" and sufficient postage must be provided), but only official "Second Chance Sweepstakes" entry forms found in select Game Tickets may be submitted. Any envelope mailed in using certified services or which require a signature will be disqualified. Only envelopes mailed with first class postage will be accepted. Entries must be legible and on the original Official Entry Form, no photocopies or reproductions of any kind, to be considered an Eligible Entrant. (C) Online Game: There are a total of 17,737,361 unique, one-time-use only Online Game Codes found inside certain Game Tickets. Online Game prizes include a \$6,700 Outdoor Gear Package, \$1,000 TOPS Grocery/Gas Gift Card, \$100 TOPS Grocery/Gas Gift Card, \$10 TOPS Grocery/Gas Gift Card, \$5 TOPS Grocery/Gas Gift Card, Free Delivery from Instacart from a participating TOPS Store (\$99 ARV), ten (10) 4 x 6 prints plus one (1) 5 x7 print from FreePrints.com (\$3.68 ARV), one (1) Classic Card from InkCards.com (\$2.00 ARV), Free Products or two (2) Free Game Tickets. Plus discount offers of \$10 off your first Instacart order from a participating TOPS Store, \$5 off your first Instacart order from a participating TOPS Store, TOPS \$1 and \$2 BonusBucks. The Online Game is open only to Eligible Entrants. Online access and a valid email address are required to participate in the Online Game. (D) Online Second Chance Sweepstakes: If the Online prize for the \$6,700 Outdoor Gear Package is not claimed by July 6, 2019, then and ONLY then will a drawing be held for this prize on or about July 11, 2019. Each Online Game Code entered during the course of the promotion by an Eligible Entrant will earn the Eligible Entrant one (1) Online Second Chance Sweepstakes entry. The drawing will be held on or about July 11, 2019 from among all eligible Official Online Second Chance Sweepstakes entries received by the Sponsor.

To play your Online Game Code found inside certain Game Tickets, log onto TopsMarkets.com (the "Website") and click on the Online Game Button (Online Game Codes may be played between 12:00:00 a.m. on March 17, 2019 Eastern Daylight Savings Time (EDT) and 11:59:59 p.m. EDT on June 22, 2019). Follow the directions on the Website (that will require you to establish a "My Account", as that term is defined below) and enter your 12-digit alphanumeric Online Game Code found on the Game Ticket. The Website will reveal if you are a potential winner of a specified prize, subject to verification. Potential winners will be provided details on how to verify the Online Game Code online as well as via an email containing an Online Prize Winner form that must be completed and returned to the Sponsor. Details on claiming an Online Game prize are provided on the form. The Online Prize Winner form must be returned to the Sponsor and postmarked by June 29, 2019 and received by July 6, 2019 to remain eligible. ALL POTENTIAL WINNERS ARE SUBJECT TO VERIFICATION BY SPONSOR OR ITS OFFICIAL JUDGING AGENCY, WHOSE DECISION IS FINAL AND BINDING. AN ENTRANT IS NOT A WINNER OF ANY PRIZE, EVEN IF THE WEBSITE SHOULD SO INDICATE, UNLESS AND UNTIL EACH ENTRANT'S ELIGIBILITY AND THE ONLINE GAME CODE HAS BEEN VERIFIED AND ENTRANT HAS BEEN NOTIFIED THAT VERIFICATION IS COMPLETE. SPONSOR WILL NOT ACCEPT SCREEN SHOTS OR OTHER EVIDENCE OF WINNING IN LIEU OF ITS VALIDATION PROCESS. ANY ONLINE PARTICIPATION THAT OCCURS AFTER THE SYSTEM HAS FAILED FOR ANY REASON IS DEEMED A DEFECTIVE ENTRY AND IS VOID AND WILL NOT BE HONORED. Limit one (1) My Account registration per person and/or email address. Any entrant who attempts to secure more

than one My Account registration by using different names, addresses, email addresses, or uses any device or artifice to circumvent these Official Rules will be disqualified and ALL of their Online participation including potentially winning Online Game Codes will be forfeited. Each entrant will be required to complete all online registration form fields: first and last name, email address, phone, preferred TOPS Store, TOPS BonusPlus® number, choose a password and confirm it, and click to enter the Online Game Website and enter the alphanumeric Online Game Code shown. You will also be required to acknowledge that you have read and agree to the Official Rules. You must also read the Eligibility requirements, and then check the box to verify that you comply. If you do not comply, you cannot play the Online Game. My Account: When you register for the Online Game, a My Account page ("My Account") will be created for you. Your My Account will contain information about your Online play activity, for example, but not limited to: the entry of Online Game Codes that you have played, the prizes for which you are a potential winner, and the prizes you have won. While reasonable efforts will be made to record, maintain and keep current the information in your My Account, due to technical or other errors or failures, the information may not always be current and accurate, and Sponsor will not assume responsibility or liability for inaccurate information. Passwords: You are solely responsible for the security of your email address and password. You should take precautions to keep your password private to prevent unauthorized use. Neither Sponsor nor any other person or entity will be responsible for any losses, damages or consequences you may suffer due to careless or unauthorized use of your password. THE ONLINE GAME COMPUTER SYSTEM REQUIREMENTS ARE: JavaScript must be enabled on the browser. Browsers: On PC computers: Internet Explorer 11 or higher, Google Chrome 30 or higher and Firefox 28.0 or higher. On Mac computers: Firefox 28 or higher, Google Chrome 30 or higher, and Safari 9 or higher. The Online Game is optimized for use with 1024 x 768 - 1920 x 1080 screen resolutions. To play the Online Game, your browser must be configured to allow session cookies.

6. WINNER SELECTION AND NOTIFICATION: (A) Instant Win Prizes: Potential Instant Win prize winners of prizes valued greater than \$10 must complete a High Level Prize Form and send the original Instant Coupon and the prize form to the Administrator for verification. Potential Instant Prize free product coupon winners may have their Instant Prize product coupon verified and prize awarded at a participating TOPS Store by initialing the front of the original potential winning Game Ticket in the lower right-hand corner and submitting it to an authorized Store cashier. All coupon items not available in all markets. Potential winners of TOPS Grocery Gift Cards valued \$5 to \$10 may have their Instant Prize Game Ticket verified and prize awarded at a participating TOPS Store by initialing the front of the original potential winning game coupon in the lower right-hand corner and submitting it to an authorized Store cashier. (B) Second Chance Sweepstakes: The Second Chance Sweepstakes Drawings will be held on or about July 11, 2019, with the winner(s) notified by a TOPS representative. Odds of winning a prize in the Second Chance Sweepstakes depend on the number of eligible entries received and the number of Second Chance prizes that are left to be awarded. (C) Online Game: Eligible Entrants who play a winning Online Game Code will win the prize associated with the unique Online Game Code that is entered, subject to verification by the official judging agency. To be eligible to win, your original Online Game Ticket must be affixed to the Online Prize Winner form with Online Game Ticket complete and Online Game Code clearly visible. Online Prize Winner forms with Online Game Tickets affixed in any other manner or with Online Game Code Coupon missing will be void. Online Game Tickets and the associated Online Game Code may only win once. For odds, see Section 15 and Official Odds Chart above. (D) Online Second Chance Sweepstakes: The Online Second Chance Sweepstakes will be held if the Online prize for the \$6,700 Outdoor Gear Package is not claimed by July 6, 2019, then and ONLY then will a drawing be held for this prize on or about July 11, 2019, with the winner notified by a TOPS representative. Odds of winning the prize in the Online Second Chance Sweepstakes depend on the number of eligible entries received.

7. PRIZES: (A) Instant Winner Prizes: The following are referred to herein as "Instant Winner" Prizes: Ten (10) - \$25,000 Car (payable in cash); Four (4) - \$10,000 Cash; Twenty-five (25) - \$1,000 in TOPS grocery/gas gift cards; One hundred (100) - \$100 in TOPS grocery/gas gift cards; Twenty-five hundred (2,500) - \$10 in TOPS grocery/gas gift cards; Fifteen thousand seven hundred fifty (15,750) - \$10 in Free Taste Bucks; Ninety thousand (90,000) -\$6.00 one (1) free offer for bowling at GoBowling.com; Five thousand (5,000) - \$5 in TOPS grocery/gas gift cards; Two hundred thirty thousand (230,000) - \$3.68 ten (10) 4 x 6 prints plus one (1) 5 x7 print from FreePrints.com; Two hundred thirty thousand (230,00) - \$2.00 one (1) Classic Card from InkCards.com; Ninety-five thousand (95,000) - \$1.50 Redbox Free Movie Rental; Seven hundred seventeen thousand eight hundred-eighty (717,880) Game Tickets will include a coupon redeemable for a designated free product from a TOPS Store ("FREE Product Prizes") which will be awarded at participating TOPS Stores. There are 105 different Instant Winner Free Product offers with retail values ranging from 50¢ to \$17.99 with an average retail value of \$1.88 for a total of 717,880 FREE Product Prizes with a Total ARV of \$1,348,984. Two hundred fifty thousand (250,000) - 50 TOPS GasPoints; One million (1,000,000) - Two (2) TOPS Game Tickets (ARV \$0); B) Second Chance Sweepstakes Prize: The following is referred to herein as "2nd Chance Sweepstakes" Prize: Any Instant Win \$25,000 Car (payable in cash) prize that is not claimed with an Instant Win coupon by July 6, 2019 will be included in the 2nd Chance Sweepstakes. A total of ten (10) \$25,000 Car (payable in cash) prizes from the combination of all the Instant Win \$25,000 Car (payable in cash) prizes and the Second Chance Sweepstakes \$25,000 Car (payable in cash) prizes will be awarded. If all ten (10) \$25,000 Car (payable in cash) Prizes have been awarded by July 6, 2019, one additional \$25,000 Car (payable in cash) will be added for this Second Chance Drawing. (C) Online Prizes: The following is referred to herein as "Online" Prizes: One (1) \$6,700 Outdoor Gear Package which includes \$4,200 in Outdoor Gear and \$2,500 in Cash, Ten (10) \$1,000 TOPS Grocery/Gas Gift Card, Twenty-five (25) \$100 TOPS Grocery/Gas Gift Card, One thousand (1,000) Free Delivery from Instacart from a participating TOPS Store (\$99 ARV), Thirty-five thousand (35,000) ten (10) 4 x 6 prints plus one (1) 5 x7 print from FreePrints.com (\$3.68 ARV), Five hundred (500) \$10 TOPS Grocery/Gas Gift Card, One thousand (1,000) \$5 TOPS Grocery/Gas Gift Card, Thirty-five thousand (35,000) one (1) Classic Card from InkCards.com (\$2.00 ARV), One hundred forty-five thousand five hundred (145,500) Game Tickets will include a code for a coupon redeemable for a designated free product from a TOPS Store ("FREE Product Prizes") which will be awarded at participating TOPS Stores. There are 40 different Instant Winner Free Product offers with retail values ranging from 50¢ to \$4.99 with an average retail value of \$1.80 for a total of 145,500 FREE Product Prizes with a Total ARV of \$262,590. There are 20,000 TOPS \$2 TOPS Bonus Bucks redeemable for \$2 off a Qualifying Transaction at a TOPS Store, 40,000 \$1 TOPS Bonus Bucks redeemable for \$1 off a Qualifying Transaction at a TOPS Store for a total value of \$80,000, and Five hundred thousand (500,000) two (2) Free Game Tickets. (D) Online Second Chance Sweepstakes Prize: If the Online prize for the \$6,700 Outdoor Gear Package is not claimed by July 6, 2019, then and ONLY then will a drawing be held for this prize on or about July 11, 2019. TOTAL ARV OF ALL PRIZES: \$4,747,474. (E) **Discount Offers:** There are 235 different Cents-Off Coupons with a value ranging from 20¢ to \$1.00 with an average retail value of 32¢ for a total of 23,668,795 Cents-off Coupons with a total value of \$7,581,291. There are 170,000 one (1) Free Prints \$5 Photo Book from FreePhotoBook.com which does not include shipping and handling for a total value of \$850,000. There are 170,000 \$20 Off Custom Photo Canvas from CanvasWorld.com for a total value of \$3,400,000. There are 170,000 \$10 Off any Custom Card or Stationery from SimplytoImpress.com for a total value of \$1,700,000. There are 170,000 \$15 Off Custom Phone Case from MyCustomCase.com for a total value of \$2,550,000. There are 95,000 Coupons for Redbox Movie Rental to buy one movie rental and get one movie rental free for a total value of \$142,500.00. There are 950,000 Coupons for GoBowling.com to buy one game and get one game free for a total value of \$5,700,000.00. (F) Online Discount

Offers: There are 3,000 \$10.00 off your first Instacart order with a minimum \$35 order and 3,000 \$5.00 off your first Instacart order with a minimum \$35 order for a total value of \$45,000. TOTAL ARV OF ALL DISCOUNT OFFERS: \$21,968,791.

8. TO CLAIM A PRIZE: Only original Promotion materials with Sponsor's unique coding TOPS-10 are accepted. Any facsimiles, copies, and/or reproductions are void. (A) Instant Winner Prizes over \$10 ARV: Potential Major Prize winners of \$10.01 or greater must review prize claim materials, complete and deliver to Sponsor a High Level Prize Winner Form and, if applicable, affix the Instant Winner Coupon to an official Prize Form in the presence of an authorized TOPS Store representative ("Pre-Verification") or provide original Instant Winner coupon, who will arrange for verification by the Sponsor's official judging agency (CPS, Inc., Kennesaw, GA). The Sponsor will notify the potential winner of the official judging agency's decision within twenty-one (21) days and verified winners will be paid within 60 days after receipt of the prize claim materials from the potential winner. Eligible Entrants attempting to claim "Instant Winner" prizes must bring the original Instant Winner coupon to a TOPS Store for Pre-Verification by July 6, 2019. Potential winners of prizes valued at \$5,000 or greater will be required to provide a photocopy of their driver's license or passport as proof of identity before the prize will be awarded. Upon request, the Eligible Entrant will be provided a copy of their High Level Prize Winner Form and submitted Promotion materials for their files when Eligible Entrant submits them to a TOPS Store representative for verification. Once original Promotion materials are submitted, they become the property of the Sponsor and will not be returned. (B) Instant Winner Prizes of \$10 or Less ARV: Instant Winners of \$10 or less must review prize claim materials, and provide original Instant Winner coupon initialed in the lower right hand corner in the presence of an authorized TOPS store representative, and have submission verified and prize will be awarded at a participating TOPS store. Instant Winner Free Product Prizes must be redeemed between March 17, 2019 and July 6, 2019. (C) Online Game Prizes over \$10 ARV: After entering the Online Game Code, the Website will reveal if you are a potential winner of a specified prize. Potential winners of \$6,700 Outdoor Gear Package, \$1,000 TOPS Grocery/Gas Gift Card or \$100 TOPS Grocery/Gas Gift Card, will need to print the Online Prize Winner form presented online or from the e-mail sent to the e-mail address provided and then attach the original Online Game Ticket to the form and mail it to the official judging agency at the address provided on the form. (D) Online Game Prizes of \$10 or Less ARV: Potential winners of \$10 in TOPS Grocery/Gas Gift Cards, \$5 in TOPS Grocery/Gas Gift Cards and two (2) TOPS Game Ticket prizes will need to print an Online Prize Winner form from the e-mail sent to the email address provided and then attach the original Online Game Ticket to the form and bring it to your TOPS Store for verification, while supplies of Game Tickets last. Complete details on claiming a prize are provided on the form. \$2 and \$1 TOPS Bonus Bucks and Free Product prizes will be awarded in the form of eCoupons; winners of these prizes will click "Add Coupon" after the prize has been displayed online to have the prize added directly to their TOPS BonusPlus® account. \$2 and \$1 TOPS Bonus Bucks and Free Product prize will be automatically subtracted from the customer's next order, provided they present their TOPS BonusPlus[®] at checkout and meet the purchase requirements of the prize. (E) 2nd Chance Sweepstakes: A separate sweepstakes prize form will be provided to the potential winner to complete before prize is awarded. (F) Online 2nd Chance Sweepstakes: A separate sweepstakes prize form will be provided to the potential winner to complete before prize is awarded.

9. GENERAL TERMS/CONDITIONS: This Promotion is void where prohibited. Entry into the Promotion, where lawful, constitutes permission to use name, voice, photograph or likeness of prize winners for advertising/publicity purposes in any and all media now known or hereinafter invented without territorial or time limitations and without additional compensation. Major Instant Winner, Second Chance Sweepstakes, and Online Game prize winners will be obligated to sign and return an affidavit of eligibility and liability release and, where lawful, a publicity release within ten (10) days of notification by Sponsor. In the event of non-compliance by a prize

winner or if prize is returned as non-deliverable, the prize will be forfeited and will not be awarded. All Instant Winner Prize coupons and all original Promotion materials submitted for verification, become the property of the Sponsor and will not be returned. All tax liability on all prizes is solely the responsibility of the prize winner. The prize winner will receive a 1099 if the prize value is \$600 or greater. Sponsor may, at its discretion, award any and all prizes to the winner as a check in the amount of the stated retail value of the prize. Any company (other than TOPS) or product depicted on the Game Tickets or other game materials are not sponsors nor affiliated with this Promotion in any way. All issues and questions concerning the construction, validity, interpretation and enforceability of these Official Rules or the rights and obligations as between the entrant and the Sponsor and any participating companies in connection with the Promotion shall be governed by and construed in accordance with the internal laws of the State of New York including procedural provisions without giving effect to any choice of law or conflict of law rules or provisions that would cause the application of any other state's or jurisdiction's laws. Each entrant agrees that the Sponsor and any participating companies involved in this Promotion are not responsible for: (A) any illegible, incorrect or inaccurate information, whether caused by entrant, printing errors or by any of the equipment or programming associated with or utilized in the Promotion; (B) technical failures of any kind, including, but not limited to malfunctions, interruptions, or disconnections in phone lines or network hardware or software; (C) unauthorized human intervention in any part of the entry process or the Promotion; (D) technical or human error which may occur in the administration of the Promotion or the processing of entries; (E) late, lost, undeliverable, illegible, damaged or stolen mail; or (F) any injury or damage to persons or property that may be caused, directly or indirectly, in whole or in part, from entrant's participation in the Promotion or receipt or use or misuse of any prize. Disputes: Except where prohibited, entrant agrees that: (i) any and all disputes, claims and causes of action arising out of or connected with this Promotion or any prize awarded shall be resolved individually, without resort to any form of court or class action, and exclusively by binding Arbitration under the American Arbitration Association Consumer rules and procedures, at which point all arbitration will be conducted in the State of New York; (ii) any and all claims, judgments and awards shall be limited to actual out-of-pocket costs incurred, including costs associated with entering this Promotion, but in no event attorneys' fees; and (iii) under no circumstances will an entrant or Eligible Entrant be permitted to obtain awards for, and each entrant or Eligible Entrant hereby waives, all rights to claim, indirect, punitive, incidental and consequential damages and any other damages, other than for actual out-of-pocket expenses, and any and all rights to have damages multiplied or otherwise increased. Prizes cannot be substituted or transferred except at the discretion of TOPS due to availability. Except as expressly contemplated by these Official Rules, unclaimed prizes will not be awarded. Hasbro is not a sponsor of this promotion. The MONOPOLY name and logo, the MR. MONOPOLY name and character, as well as each of the distinctive elements of the game tickets are trademarks of Hasbro for its property trading game and game equipment. ©1935, 2019 Hasbro. All rights reserved.

TOPS Markets[®] (TOPS) believes in the importance of protecting our customers' information. TOPS values your business and the trust you place in us. To help you better understand how customer information is collected, used and protected at TOPS, this Privacy Policy outlines: (a) our definition of customer information, (b) how customer information is collected, (c) how customer information is used, (d) how you may prevent your customer information from being collected, and (e) the measures we take to safeguard customer information. Our primary reasons for collecting customer information is to help us deliver greater value to you and to improve your shopping experience with us. For example, we may use customer information to advise you about products, services, special savings, coupons and discounts we believe may be of interest to you, and to advise you of important information such as product recalls. The Sponsor believes in the importance of protecting its customers information and its complete privacy policy may be found online at http://www.TOPSmarkets.com/privacy/privacy_S.las.

10. GAME MATERIALS: Only original Game Tickets and Online Game Tickets with Sponsor's unique coding of TOPS-10 ("Promotion Materials") are accepted. All Promotion Materials will be rejected and judged VOID if not legitimately obtained through authorized channels and verified by an authorized TOPS Store representative, or if any part of any Game Ticket or Online Game Ticket is illegible, altered, mutilated, defaced, tampered with, forged, contains printing, seeding, mechanical, or other errors, or is irregular in any way. Entrant's sole remedy for irregular Promotion Materials will be limited to replacement with another randomly selected Game Ticket while supplies last. Any attempt to defraud or forge any Promotion Materials in any way will be prosecuted to the fullest extent of the law. No more than the number of advertised prizes in the Official Rules in any prize category will be awarded. If a printing, seeding, mechanical, or any other error causes the number of prize claims in any prize category(s) to exceed the number of prizes set forth in that category in the Official Rules, a random drawing will be conducted from all eligible entries in that category, to award the total number of prizes that are advertised in that category.

11. WINNERS LIST: The names (first name, last initial) of the Major Prize winners with \$600 value or greater may be obtained at the conclusion of the Promotion by sending a first class stamped, self-addressed return envelope to: TOPS-10 Game Winners, P. O. Box 813368, Smyrna, GA 30081. Requests must be received by August 31, 2019. Vermont residents may omit return postage to Vermont addresses or, with proof of Vermont residency, to other addresses.

12. CONTEST DELAY/EXTENSION: The Sponsor may delay the Promotion commencement date and thereafter extend the Promotion Period, if such commencement is delayed by a cause that is beyond the reasonable control of the Sponsor.

13. PARTICIPATING STORES: This Promotion is being conducted in 163 participating TOPS Stores being operated as a "TOPS Friendly Market" by TOPS and/or its affiliates or franchisees in New York, Pennsylvania and Vermont (excluding TOPS fuel stations, convenience stores, including TOPS Xpress and TOPS Fresh Xpress locations, and in-store Tim Horton's franchise locations).

14. TICKETS DISTRIBUTED: A total of 33,000,000 Game Tickets will be distributed in participating TOPS Stores and/or via alternate entry methods.

15. ODDS: Odds of Winning prizes are based on getting the one Game Ticket containing the Online Game Code or Instant Winner message or Coupon. Prizes indicated by an asterisk (*) in the odds chart are Instant Winner/Free product prizes.

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ODDS CHART/PRIZE VALUE

Prize Description	Quantity Available	Odds with 1 Game Ticket	Total Value
Instant Win Game:			
\$25,000 Car (payable in cash)	10	3,300,000:1	\$250,000
\$10,000 Cash	4	8,250,000:1	\$40,000
\$1,000 TOPS Grocery/Gas Gift Card	25	1,320,000:1	\$25,000
\$100 TOPS Grocery/Gas Gift Card	100	330,000:1	\$10,000
\$10 TOPS Grocery/Gas Gift Card	2,500	13,200:1	\$25,000
\$10 Free Taste Bucks	15,750	2,095:1	\$157,500
\$6 GoBowling.Com (free offer)	90,000	366.67:1	\$540,000
\$5 TOPS Grocery/Gas Gift Card	5,000	6,600:1	\$25,000
\$3.68 FreePrints.com / ten 4x6 plus one 5x7 prints	230,000	143:1	\$846,400
\$2 InkCards.com / Free Classic Card	230,000	143:1	\$460,000
\$1.50 Redbox Free Rental	95,000	347:1	\$142,500
Free Product*	717,880	46:1	1,348,984
50 TOPS GasPoints	250,000	132:1	\$207,500
Two (2) Free Game Tickets	1,000,000	33:1	\$0
Total	2,636,269	13:1	\$4,077,884
Online Game			
\$6,700 Outdoor Gear Package	1	33,000,000:1	\$6,700
\$1,000 TOPS Grocery/Gas Gift Card	10	3,300,000:1	\$10,000
\$100 TOPS Grocery/Gas Gift Card	25	1,320,000:1	\$2,500
\$99 Instacart Delivery for Year Membership	1,000	33,000:1	\$99,000
\$10 TOPS Grocery/Gas Gift Card	500	66,000:1	\$5,000
\$5 TOPS Grocery/Gas Gift Card	1,000	33,000:1	\$5,000
\$3.68 FreePrints.com / ten 4x6 plus one 5x7 prints	35,000	943:1	\$128,800
\$2 InkCards.com / 1 Classic Card	35,000	943:1	\$70,000
Free Product*	145,500	227:1	262,590
\$2 TOPS BonusBucks	20,000	1,650:1	\$40,000
\$1 TOPS BonusBucks	40,000	825:1	\$40,000
Two (2) Free Game Tickets	500,000	66:1	\$0
Total	778,036	42:1	\$669,590

The 2nd Chance Sweepstakes prize is a \$25,000 Car (payable in cash). If any of the ten (10) Instant Win \$25,000 Cars (payable in cash) have not been claimed by July 6, 2019, the remaining number will be drawn at this time. A total of ten (10) \$25,000 Cars (payable in cash) will be awarded from the combination of the Instant Win and 2nd Chance Sweepstakes. If all ten (10) Instant Win \$25,000 cars (payable in cash) have been awarded, there will be one (1) additional \$25,000 Car drawn in the 2nd Chance Sweepstakes. The Odds are dependent on the number of entries received.

* Free Product prizes: Instant Win Game has 105 different Free Product Prizes with a value between 50¢ and \$17.99 with an average value of \$1.88. Online Game has 40 different Free Product Prizes with a value between 50¢ and \$4.99 with an average value of \$1.80.