

SpartanNash Vendor Code of Conduct

November 2020



At SpartanNash, a key part of **Our Winning Recipe** is living our Core Behaviors – **We Serve, We Create Solutions, We Win and We Have Fun** – each and every day. We are determined to work with Vendors who share our commitment to operating in a **legal, ethical, safe, fair and environmentally responsible** manner.

The key to our success is our family of 17,500 Associates, who put our customers, consumers, communities and coworkers first. We are an inclusive culture and will not tolerate discrimination in any form. We expect no less from our Vendor partners. We define Vendors as any person or company that supplies SpartanNash with goods and/or services (“Vendors”).

We are a company that delivers the ingredients for a better life, which means we hold ourselves to high standards and choose to work with Vendors that do the same. The SpartanNash Vendor Code of Conduct (“Vendor Code” “Code”) describes our expectations for our Vendors and how they conduct their businesses. All SpartanNash Vendors are expected to act in accordance with the Vendor Code, and to advise us promptly if they find themselves out of compliance with any provision of this Code.

Please take the time to fully review the provisions of this Code and talk to us if you have any questions or concerns. We expect that all SpartanNash Vendors will follow the provisions of the Vendor Code, and comply, at a minimum with all applicable laws, rules, regulations and standards governing their operations.

Vendor Code of Conduct

1. Act Ethically and with Integrity

We hold ourselves accountable to operating with the highest ethical standards and in compliance with all applicable laws, rules and regulations. We expect our Vendors to similarly hold themselves, and their Associates, accountable.

2. Avoid Conflicts of Interest

Vendors must avoid any situation or relationship that may involve a conflict of interest or the appearance of a conflict of interest in their dealings with SpartanNash. This includes any conduct likely, intending, or appearing to improperly influence any SpartanNash Associate in the performance of his or her job, such as offering or providing cash payments, gifts, personal travel expenses, lodging or other housing, or excessive meals or entertainment to SpartanNash Associates or their family members. Gifts and entertainment may only be accepted by SpartanNash Associates when permitted under applicable law if they are appropriate regarding the time and place, and are either (1) non-cash gifts of nominal value (less than \$100), or (2) customary and reasonable meals and entertainment at which the giver is present, such as the occasional business meal or sporting event. See the **SpartanNash Code of Conduct** if there are questions about what is acceptable.

3. Act in Compliance with Laws and Contracts

Vendors must perform all duties in compliance with all laws and regulations applicable to their business and comply with all terms, conditions, and other provisions specified in any contract or purchase order with SpartanNash. When transacting business across international borders, or if a Vendor’s primary place of business is located outside the United States, Vendors must comply with all applicable local laws and regulations. All products supplied to SpartanNash must be safe, high-quality, of excellent value, and fully compliant with applicable laws, regulations, and standards, including product and food safety and global trade laws governing country of origin, importation, customs entry, export controls, and licensing.

a. Comply with Fair Competition/Anti-Trust Laws

We expect our Vendors to comply with all applicable anti-trust or anti-competition laws and regulations that govern the jurisdictions in which they conduct business.

b. Comply with Anti-Corruption Laws

We expect our Vendors to comply with the anti-corruption laws of the countries in which they do business and with the United States Foreign Corrupt Practices Act (“FCPA”). Vendors may not make any direct or indirect payments or promises of payment to foreign government officials for the purpose of inducing the individual to use or misuse his/her position to obtain or retain business.

c. Insider Trading

Vendors are prohibited from engaging in insider trading, including buying, selling, or taking any futures position in SpartanNash stock while in possession of information about our company that is not generally available to the investing public and that could influence an investor's decision to buy or sell stock.

4. Protect Privacy and Data

We expect our Vendors to protect confidential information. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of SpartanNash. In addition, Vendors must comply with all applicable privacy/data protection and information security laws and regulations.

5. Source Minerals Responsibly

Vendors that supply products that include minerals sourced from conflict-affected and high-risk areas (including, but not limited to, cobalt, tantalum, tin, tungsten or gold) must ensure that the sourcing of these minerals does not knowingly contribute, directly or indirectly, to armed conflict, including terrorist financing or human rights violations. We expect the sourcing of these minerals to be in a manner consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

6. Human Rights

SpartanNash recognizes its responsibility to protect human rights. Examples of such rights are articulated in internationally recognized standards, including the Universal Declaration of Human Rights, and the International Labor Organization (ILO) Core Conventions. We expect our Vendors to have similar policies and practices that apply to all Associates, suppliers, and their supply chains, including migrant, seasonal and temporary workers, and address the following topics (a) to (g):

a. Wages and Benefits

Vendors should provide wages and benefits that meet or exceed the requirements of local law. At a minimum, Vendors should pay Associates regularly and timely the legal minimum wage. We require our Vendors to provide all legally mandated benefits. Overtime work must be performed and compensated in accordance with the law.

b. Working Hours

Vendors should not require their Associates to work in excess of the relevant legal limits on working hours, overtime hours and number of working days per week. Associates shall be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law.

c. Slavery, Forced Labor and Human Trafficking

SpartanNash does not tolerate slavery, forced labor, or human trafficking in any form and we will not knowingly work with Vendors who engage in these practices or permit their subcontractors to engage in these practices. We expect our Vendors to fully comply with requirements of applicable slavery, forced labor and human trafficking laws, including without limitation the UK Modern Slavery Act 2015. Vendors must not engage in practices associated with forced labor. These practices, identified by the International Labour Organization (ILO), include withholding of wages, retention of identity documents, and restriction of movement. Additionally, Vendors must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists within their extended supply chains.

d. Child Labor

Vendors must not employ child labor and should take the necessary preventive measures to ensure that they do not employ anyone under the applicable legal minimum age of employment. SpartanNash fully supports and abides by ILO Conventions 138 and 182, and the UN Convention on the Rights of the Child. The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is higher. When employing

Associates over the age of 15 (or 14 where the law of the country permits) and under the age of 18, Vendors must ensure that such employment is in accordance with the relevant law and must provide adequate protection against any conditions that may be hazardous to the health and safety of young Associates.

e. Non-discrimination

SpartanNash expects its Vendors to treat our Associates, our customers and their employees with dignity and respect.

We expect our Vendors to share our commitment to human rights and equal opportunity in the workplace. Vendors shall conduct their employment practices in full compliance with all applicable laws and regulations and must operate an inclusive work environment in which discrimination in any form is not tolerated.

f. Provide a Complaint Mechanism

We expect our Vendors to have a process through which their Associates can raise workplace concerns without fear of retaliation.

g. Safe and Healthy Work Environment

Vendors must provide a safe and healthy working environment that minimizes health and safety risks and supports accident prevention and ensures the health and safety of all personnel and all others affected by their activities. Vendors are required to, and shall require their subcontractors to, comply with all applicable safety and health laws and regulations in the jurisdictions in which they operate, and to provide Associates with access to appropriate personal protective equipment at no cost.

7. Vendor Diversity & Inclusion

SpartanNash believes that diversity is a social and economic imperative and looks to Vendors to share this commitment in their operations and within their supply chain. Vendors are expected to take proactive steps to provide a full spectrum of businesses – based on the ownership structure (for example, minority owned, women owned, veteran owned, locally owned), scale (for example, small or medium enterprise) or nature of the enterprise (for example, social enterprise) – with the opportunity to compete on a fair and equal basis for business.

8. Environmental Stewardship

Environmental stewardship is an important imperative for SpartanNash. We encourage our Vendors to adhere to similar environmental efforts as appropriate to their businesses and aligned with best practices locally and globally. This includes implementing processes to identify and manage risks and opportunities related to climate change and water.

a. Energy and Emissions

We encourage our Vendors to track, manage, and mitigate the environmental impact of their operations and strategies, and those of their suppliers. Where feasible, Vendors should take steps to incorporate how they will mitigate the impact of climate change into their strategies and business resiliency plans, through establishing greenhouse gas (GHG) emission reduction targets, selecting low-GHG products and services, and other initiatives, where relevant. If requested by SpartanNash, we encourage Vendors to disclose energy and emissions management policies and performance.

b. Water

Vendors are encouraged to take steps to conserve, reduce use of, and reuse water in their own operations. Vendors are also encouraged to manage water resources to ensure their operations do not prevent access to sufficient safe water for all users in surrounding communities, including those both up and downstream from their facilities.

c. Waste

Vendors are encouraged to take concrete steps to minimize or eliminate waste across their operations and those of their suppliers. Any waste, and in particular hazardous waste, must be managed in a responsible manner. Chemical and other materials posing a hazard if released to the environment should be identified and managed to ensure safe handling, movement, storage, recycling or reuse and disposal. All Associates who handle waste and hazardous wastes must be properly trained on how to deal with substances and the potential hazards the material presents if mismanaged or released to the worker and environment. Vendors must only use permitted transporters and haulers that have a positive record of operating safely and complying with applicable transportation laws and best management practices.

d. Material Restrictions and Handling

All materials used by Vendors must comply with applicable rules, laws, and regulations regarding the prohibition or restriction of specific substances to ensure safe and responsible handling, storage, movement, reuse, recycling and disposal.

This Vendor Code sets forth our expectations for current and future Vendors. We expect all new and existing Vendors to meet our minimum expectations and to aspire to make continuous improvements to their businesses as noted herein across ethical, human and labor rights, vendor Diversity & Inclusion and environmental areas.

Any facts or circumstances which are likely to lead to your inability to meet the requirements and expectations of this Vendor Code should be reported immediately to SpartanNash.

We provide our Associates and the public with a channel to raise concerns without fear of retaliation. If you encounter what you believe to be any potential integrity concerns, including but not limited to violation of local laws or regulations, or this Vendor Code, or unethical behavior, you may report your concerns via the SpartanNash Ethics Line. Retaliation of any kind against an individual who reports concerns in good faith will not be tolerated.

Our **SpartanNash's Ethics Line** is available 24 hours a day, seven days a week:

800-710-4848 or spartannashcompany.ethicspoint.com

If a Vendor is in violation of the requirements of this Vendor Code, we expect that Vendor to inform us immediately or as soon as is practicable and remedy any such violation in a timely and sensitive manner. Failure by a Vendor to do so may lead to review or termination of our relationship. SpartanNash will assess its Vendor's compliance with this Code, and any violations may jeopardize a Vendor's relationship with SpartanNash and, in appropriate circumstances, may lead to the termination of that relationship.

We are committed to continuously reviewing and updating this Vendor Code. Therefore, this Vendor Code is subject to modification from time to time. The latest version of [this Vendor Code is available here](#).

The contents of this Vendor Code are additional to and do not in any way affect or prejudice any of SpartanNash's rights and remedies under the relevant contracts with each Vendor, if any.

The failure or omission by SpartanNash to insist upon strict performance and compliance with any of the provisions of this Vendor Code at any time shall in no way constitute a waiver of its rights.

In the event of any conflict or ambiguity between any provision of this Vendor Code and the provisions of any relevant contract with any Vendor, the provisions of that contract will prevail.