

Whole Foods Market Supplier Code of Conduct

At Whole Foods Market, we are strongly committed to ensuring that the products and services we provide are produced in a way that respects human rights and the environment and protects the fundamental dignity of workers. We engage with suppliers that are committed to the same principles, and we set exacting standards for suppliers of goods and services for Whole Foods Market and Whole Foods Market's subsidiaries. These standards are derived from the United Nations Guiding Principles on Business and Human Rights, and the Core Conventions of the International Labour Organization (ILO), including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights. When interpreting these policies, we follow ILO guidance materials and definitions.

Our requirements and expectations for suppliers are detailed below in our Supplier Code of Conduct ("Supplier Code"). Suppliers include, but are not limited to, product suppliers in our supply chain (such as licensees, manufacturers, producers) and suppliers supporting Whole Foods Market's retail operations (such as third-party labor agencies, transportation service providers). Suppliers must comply with all applicable laws and our Supplier Code, even when this Supplier Code exceeds the requirements of applicable law.

In our application of these standards, we follow these key principles:

1. *Inclusivity*: Our standards apply to all workers regardless of race, color, national origin, gender, gender identity, sexual orientation, religion, disability, age, political opinion, pregnancy, migrant status, ethnicity, caste, marital or family status, or similar personal characteristics. We recognize these groups may be disproportionately impacted by issues addressed in our Supplier Code and may be more vulnerable to exploitation. We are committed to addressing risks specific to these groups and working with our suppliers to evaluate and address circumstances that may arise but are not specifically covered by our Supplier Code.
2. *Continuous improvement*: Whole Foods Market operates a policy of continuous improvement, and we are committed to working with our suppliers to improve protections for their workers and workplace. We reserve the right to terminate a relationship at any time for failure to meet our Supplier Code of Conduct, however, we strive to always put the interests of workers first. Termination will be considered when a supplier refuses to cooperate with an assessment, refuses to change a required behavior or practice, does not make timely progress on remediation, or engages in falsification or misrepresentation of records or other illegal or deceitful activity.
3. *Supply chain accountability*: In order to ensure these standards are cascaded throughout our supply chain, we expect suppliers to consistently monitor and enforce these standards in their own operations and supply chain, as well as make improvements to

meet or exceed our expectations and those of our customers as reflected in our Supplier Code. Suppliers are required to disclose any subcontractors or labor agents upon request. They are also expected to hold their subcontractors, and labor agents to the standards and practices covered by our Supplier Code. Suppliers with subcontracted production are required to work with their subcontractors to adopt and raise awareness of this Supplier Code. We recognize that suppliers in deeper tiers of the supply chain and suppliers in informal sectors may take more time to align with these standards. We are committed to working with suppliers to help them understand our policies. While we expect these suppliers to meet all applicable aspects of the Supplier Code, the size and structure of the suppliers (e.g., family farms, smallholders, homeworkers), will be taken into consideration when implementing these requirements.

Labor Rights

1. **Young Labor.** Whole Foods Market does not tolerate the use of child labor. Suppliers are required to engage workers who are: (i) 15 years old, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed, whichever is greater. Furthermore, workers under the age of 18 (“young workers”) must not perform hazardous work that is likely to jeopardize their health or safety or compromises their education (e.g., night shifts, overtime).

Light Work: In accordance with international labor standards, light non-hazardous work in select circumstances is permitted as long as the child helps their parents or relatives in ways that do not jeopardize their education, health, schooling, or personal and physical development. In all circumstances, suppliers must comply with child labor laws and international labor standards.

2. **Student Workers:** Whole Foods Market supports the development of legitimate workplace apprenticeship programs that support the students’ educational goals and comply with Whole Foods Market’s Supplier Code and applicable local laws. Suppliers are required to ensure careful management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations. In the absence of local law, the wage rate for student workers, interns, and apprentices must be at least the same wage rate as other entry-level workers performing equal or similar tasks. Apprenticeship programs should have a limited time duration or be considered as an entry point to full-time employment upon completion of the program.
3. **Involuntary Labor, Human Trafficking, and Slavery.** Whole Foods Market suppliers must not use forced labor—slave, prison, indentured, bonded, or otherwise. Whole Foods Market does

not tolerate suppliers that traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. All work must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees for their employment either in their home country or the country where work is performed. Suppliers are required to bear or reimburse to their workers the cost of any such fees incurred at any point during the recruitment process, even if outside of the suppliers' direct control of the recruitment process. All fees and expenses charged to workers must be disclosed to Whole Foods Market and communicated to workers in their native language in advance of employment or work.

Whole Foods Market also expects our suppliers to hold their third-party labor agents or brokers to the standards and practices covered by our Supplier Code. Suppliers are required to analyze and monitor the practices of recruitment agencies and labor brokers and employ agencies that act ethically and in the best interests of workers when contracting labor. Suppliers must ensure that staffing or recruiting agencies comply with our Supplier Code, as well as all applicable laws of the country where work is performed and the worker's home country.

Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working. Suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing. Workers must be given clear, understandable documentation that defines the terms and conditions of their engagement in a language and manner understood by the worker.

4. Migrant Workers: Whole Foods Market expects our suppliers to pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face and ensure migrants workers are not discriminated against in respect to these standards. Our suppliers may only engage workers who have a legal right to work unless the workers are related to an approved program with refugee populations (in which case Whole Foods Market will assess these projects on a case by case basis). If suppliers engage foreign or domestic migrant workers, such workers must be engaged in full compliance with the immigration and labor laws of the host country. Workers must be able to voluntarily terminate contracts without penalty upon reasonable or legally applicable notice.

Suppliers are required to keep up-to-date records of all employees, particularly migrant workers; this includes the basic contract terms and the workers' arrival and departure dates.

5. **Wages and Benefits.** Suppliers are required to pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws. Suppliers are required to provide to their workers the basis on which workers are being paid in a timely manner via pay stub or similar documentation. Deductions from wages as a disciplinary measure are not permitted. In addition, we encourage our suppliers to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their family.
6. **Working Hours.** Whole Foods Market expects our suppliers to regularly monitor working hours to ensure the safety, health, and welfare of workers. Except in unusual or emergency situations, (i) suppliers must not require a worker to work more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law.
7. **Anti-discrimination.** Whole Foods Market suppliers must not discriminate on the basis of race, color, national origin, gender, gender identity, sexual orientation, religion, disability, age, political opinion, pregnancy, migrant status, ethnicity, caste, marital or family status, or similar personal characteristics in hiring and working practices such as job applications, promotions, job assignments, training, wages, benefits, and termination. Suppliers must not use mandatory pregnancy or HIV tests. All medical tests required of workers or applicants must not be used in a discriminatory manner. Suppliers are required to make reasonable accommodations for workers of different religious backgrounds and must have an equal opportunity employment policy that promotes gender equality in employment practices. We encourage our suppliers to provide maternity leave.
8. **Fair Treatment.** All workers must be treated with respect and dignity. Our suppliers must not engage in or permit physical, verbal, or psychological abuse or coercion, including threats of violence, corporal punishment, mental coercion, sexual harassment, or unreasonable restrictions on entering or exiting work and residential facilities, or other forms of intimidation. Workers must be free to voice their concerns to Whole Foods Market or its auditors including through confidential worker interviews and allowed to participate in the audit process without fear of retaliation by supplier management. We encourage suppliers to provide training on non-discrimination and harassment.
9. **Freedom of Association.** Whole Foods Market expects that our suppliers respect the rights of workers to establish and join an organization of their own selection. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations.

Health and Safety

1. **Health and Safety.** Whole Foods Market expects our suppliers to provide workers with a safe and healthy work environment. Suppliers must, at a minimum, comply with applicable laws regarding working conditions and with the standards in Whole Foods Market's Supplier Code.
2. **Occupational Safety.** Suppliers are required to monitor workers' potential for exposure to safety hazards (e.g., chemical, mechanical, electrical and other energy sources, fire, vehicles, and fall hazards) and identify, assess, and control these hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, suppliers are required to provide workers with appropriate, well-maintained, personal protective equipment, together with training on when and how to use the equipment correctly and educational materials about risks to them associated with these hazards. We encourage Suppliers to monitor for workplace health and safety risks that may impact pregnant women and nursing mothers and take reasonable steps to reduce these risks and inform them of any hazards.

Occupational Injury and Illness: Suppliers are required to put procedures and systems in place to prevent, manage, and track occupational injury and illnesses, such as encouraging worker reporting, classifying and recording injury and illness cases, providing necessary medical treatment, investigating cases, and implementing corrective actions to eliminate their causes.

Industrial Hygiene: We encourage Suppliers to identify, evaluate, and control worker exposure to chemical, biological, and physical agents. This includes eliminating or controlling potential hazards through proper design, engineering, and administrative controls. Workers must be informed and receive appropriate education in advance if they will be working with (or otherwise exposed to) hazardous or dangerous conditions or materials. In addition, workers must be given appropriate personal protective equipment and educated and trained on the proper use of such equipment.

3. **Physically Demanding Work.** Suppliers must continually identify, evaluate, and control physically demanding tasks to ensure that worker health and safety is not jeopardized.
4. **Emergency Preparedness and Response.** Suppliers are required to identify and plan for emergency situations and implement and train their workers on response systems, including emergency reporting, alarm systems, worker notification and evacuation procedures, worker training and drills, first-aid supplies, fire detection and suppression equipment, and unblocked exit facilities.

5. **Machine Safeguarding.** Suppliers are required to implement a regular machinery maintenance program. Production and other machinery must be routinely evaluated for safety hazards. Where appropriate, suppliers shall provide properly maintained machinery controls (e.g., physical guards, interlocks, and barriers) when machinery presents an injury hazard to workers.

6. **Sanitation and Housing.** Workers must have reasonable access to clean toilet facilities and potable drinking water. If suppliers provide a canteen or other food accommodations, they must include sanitary food preparation, storage, and eating facilities. If suppliers provide residential facilities for their workers, they must provide clean and safe accommodations. Such residential facilities must be equipped with fire alarm, detection, and suppression equipment and workers must be provided with emergency egresses, reasonable and secure personal space, entry and exit privileges, reasonable access to hot water for bathing, adequate heat and ventilation, and reasonable transportation to and from work facilities (if not reasonably accessible by walking).

Environment

1. **Environment.** Suppliers are required to comply with applicable environmental laws; we encourage our suppliers to move beyond compliance obligations to set goals and make progress towards integrating sustainable practices throughout their operations. We encourage our suppliers to implement systems that are designed to minimize the impact on the environment through their supply chain, the production process, and the products themselves. We recognize that small-scale producers and decentralized production processes (e.g., homeworkers) may have alternative, non-traditional mechanisms to implement these requirements. Where implemented, such systems must track and document the environmental impact, including the use of energy, air emissions, waste, water, pollution, hazardous materials, and recycling. We encourage suppliers to use insights from these systems to pursue initiatives that minimize energy, water waste, and greenhouse gas emissions, and seek ways to use renewable sources of energy.

2. **Energy Consumption and Greenhouse Gas Emissions.** We encourage suppliers to track and document energy consumption and all relevant direct and indirect greenhouse gas emissions, identify methods to improve energy efficiency, and minimize their energy consumption and greenhouse gas emissions.

3. **Environmental Permits and Recordkeeping.** Suppliers are required to obtain and keep current all required environmental permits, approvals, and registrations and follow applicable legal, operational, and reporting requirements.
4. **Effective Management and Disposal of Hazardous Substances.** Suppliers are required to effectively identify and manage the safe handling, movement, storage, and disposal of chemicals and substances that pose a threat to the environment, including providing workers with appropriate training on the safe-handling and disposal of hazardous substances. Suppliers are also required to monitor and control wastewater or solid waste generated from operations before disposing in accordance with applicable laws. In addition, suppliers must characterize, monitor, control, and treat regulated air emissions before discharging in accordance with applicable laws.

Pollution Prevention and Resource Reduction: Whenever possible, suppliers should minimize air emissions, discharge of pollutants, and generation of waste through practices such as adding pollution control equipment, modifying production, maintenance and facility processes, or by other means. We encourage suppliers to minimize the use of natural resources, including water, fossil fuels, minerals, and virgin forest products, through practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

Water Management: We encourage suppliers to implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. The water management program shall require that all wastewater is to be identified, monitored, controlled, and treated prior to discharge or disposal as required by law.

Solid Waste: Suppliers are required to implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste. We encourage suppliers to set goals to minimize waste to landfill throughout their operations.

Air Emissions: Suppliers are required to identify, routinely monitor, control, and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from operations as required by law prior to discharge. At Whole Foods Market's request, suppliers are required to demonstrate that any such required air emissions control systems are performing properly.

Conflict Minerals and Land Rights

1. **Conflict Minerals.** Whole Foods Market is committed to avoiding the use of minerals that have fueled conflict in the Democratic Republic of the Congo or an adjoining

country. We expect suppliers to support our effort to identify the origin of designated minerals used in our products.

2. **Land Rights.** It is important that our suppliers respect the legal land rights of individuals, indigenous people, and local communities. Upon Whole Foods Market's request, suppliers and producers are required to demonstrate a legal right to use the land. Developments and acquisitions of agricultural and forestry land are subject to free, prior, and informed consent of the affected local communities, including women or indigenous peoples and other marginalized stakeholders.

Ethical Behavior

1. **No Bribery.** Our suppliers must not engage in bribery with anyone for any reason, whether dealing with government officials or the private sector. This includes offering, promising, giving, or accepting anything of value to obtain or provide undue or improper advantages to anyone for any reason. Our suppliers must not induce Whole Foods Market employees to violate our [Code of Business Conduct and Ethics](#).
2. **Anti-Corruption.** Suppliers are required to comply with applicable anti-corruption laws, including the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act, and never bribe a government official on Whole Foods Market's behalf. Suppliers must not offer, give, or promise anything of value, either directly or indirectly, to government officials to encourage them to act improperly or to reward them for doing so. Prohibited payments can take many forms including, but not limited to cash or cash equivalents, gifts, meals, and entertainment. Any questions regarding the applicability of this provision or exceptions to this provision must be directed to Whole Foods Market's Legal Department.
3. **Grievance Mechanism and Whistleblower Protections.** Whole Foods Market expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.
4. **Transparency.** Whole Foods Market expects suppliers to keep and maintain complete and accurate records about working conditions (e.g., wage and working hour records). Information regarding suppliers' labor, health and safety, environmental practices, and any additional information relevant to the audit process must be disclosed in accordance

with applicable regulations and upon Whole Foods Market's request. Whole Foods Market will not tolerate falsification of records or misrepresentation of conditions or practices in the supply chain.

Management Systems

1. **Management Systems.** Whole Foods Market expects that suppliers adopt a management system to drive continuous improvement and ensure compliance with applicable laws and this Supplier Code.

Management Accountability and Responsibility. Whole Foods Market expects that our suppliers have designated representatives responsible for implementing management systems and programs that oversee compliance with applicable laws as well as this Supplier Code. Senior management must routinely review and assess the quality and efficiency of the management systems and programs.

Risk Management. Whole Foods Market expects our suppliers to establish a process to identify the environmental, health, safety, and ethical risks associated with their operational and labor practices. In addition, management must develop appropriate processes to control identified risks and ensure regulatory compliance. Suppliers are required to consistently monitor and enforce these standards in their own operations, supply chain, and subcontractors, and should make improvements to meet or exceed our expectations and those of our customers as reflected in our Supplier Code. We encourage suppliers to continuously assess their risks, including those specific to vulnerable groups, including women, migrant workers, and indigenous peoples.

2. **Training.** Whole Foods Market expects our suppliers to maintain appropriate training programs for managers and workers to implement the standards in our Supplier Code and to comply with applicable legal requirements.
3. **Communication and Worker Feedback.** Whole Foods Market expects that our suppliers clearly and accurately communicate and educate workers about Whole Foods Market policies, practices, and expectations. Whole Foods Market encourages suppliers to implement a process to assess workers' understanding of their rights and responsibilities, and meaningfully engage them through worker-management committees or similar forums. Whole Foods Market may require suppliers to post educational materials in a location accessible to their workers and translated into the appropriate local language(s), train workers on the risks of key issues, and notify or otherwise train workers on their rights. Suppliers should be conscious of issues with illiteracy, ensuring that trainings take these issues into account.

4. Documentation and Records. Suppliers are required to create, retain, and dispose of business records in full compliance with applicable legal requirements along with appropriate confidentiality to protect privacy. All facilities must maintain a valid business license; suppliers are responsible for reviewing and complying with all legal requirements, and have available required permits, licenses (e.g., health and safety permits, occupancy permits, etc.) necessary to operate.