



# CODE of Business Conduct

May 4, 2018



This Code of Business Conduct (the "Code") applies to all Whole Foods Market ("WFM" or the "Company") Team Members, members of the WFM Board of Directors (each, a "Board Member"), and consultants and agents doing business for WFM.

The Code does not cover all relevant laws or WFM policies. Other Company policies and procedures, such as those found in the central or regional General Information Guides, the Amazon.com Insider Trading Guidelines applicable to Whole Foods Market and the Company Anti-Bribery Policy, supplement the policies in this Code.

The information contained in the Code is not a contract or an offer of a contract. **Violation of this Code may result in corrective action up to and including discharge.** The terms of the Code concerning the employment relationship are implemented at the sole discretion of WFM and may be withdrawn or changed at any time with or without notice.

WFM expects all of its Team Members and Board Members to act in accordance with the highest standards of personal and professional integrity at all times, and to comply with WFM's policies and procedures and all laws, rules and regulations of any applicable international, federal, provincial, state or local government.

Team Members who have questions about the Code should contact their Team Leader or email the Ethics Committee at [ethics@wholefoods.com](mailto:ethics@wholefoods.com) unless a particular provision of the Code says otherwise.

To report concerns about potential violations of the Code and any other ethics or integrity issues, including questions or concerns involving the Company's accounting, auditing, financial reporting or internal controls, Team Members should contact their Team Leader, email the Ethics Committee at [ethics@wholefoods.com](mailto:ethics@wholefoods.com), or call the Team Member Tipline.

Calls to the Team Member Tipline may be made confidentially and anonymously.

Executive officers and Board Members should contact the General Counsel to raise questions or report a potential Code violation or ethical issue.

Company policy prohibits retaliation against individuals who report violations of this Code.

**Any WFM Team Member  
in the U.S. or Canada may  
confidentially and  
anonymously report ethics  
matters by calling the  
Team Member Tipline at  
1-888-662-5025.**

**U.K. Team Members can  
do the same by calling  
0808-234-5173.**

# TABLE OF CONTENTS

Message from Whole Foods Market's CEO .....	1
ABOUT THE CODE OF BUSINESS CONDUCT .....	2
Purpose	
Your Responsibilities	
Obtaining Additional Information	
Reporting Code Violations	
No Retaliation	
Waivers	
Ethics Committee	
CONFLICTS OF INTEREST .....	4
General	
Gifts & Entertainment	
Doing Business with Spouses, Relatives, Friends or Your Own Business	
Outside Employment or Service as Director or Officer	
Financial Interest in a Competitor	
Donations and Other Payments	
Opportunities Related to the Company's Business	
Extensions of Credit	
Leasing Property and Equipment Consulting and Other Professional Services	
LEGAL COMPLIANCE .....	8
Bribes and Improper Payments	
Antitrust Laws	
Fair Dealing	
Complaints to Government Agencies	
Workplace-Related Laws and Policies	
COMPANY INFORMATION AND ASSETS .....	10
Confidentiality	
Insider Trading	
Media Inquiries	
Online Forums	
Financial Integrity; Maintaining Books and Records	
No Improper Influence on Audits	
Company Property	
WHOLE FOODS MARKET CONTACT INFORMATION .....	13
APPENDIX .....	14
Our Core Values	
Our Quality Standards	
Code of Business Conduct Amendments	

# Message from Whole Foods Market's CEO



Whole Foods Market strives to maintain the highest standards in all of our interactions with Company customers, Team Members and vendors. Our statement of Core Values (see Appendix) also reflects our commitment to all our stakeholders: our customers, our Team Members, our stockholder, and our community and environment.

As Whole Foods Market continues to grow, each of us is personally responsible to support our mission and Core Values. We have issued this Code of Business Conduct to restate our longstanding commitment to follow the law and to act ethically in all situations. The Code is intended to provide guidance to all Whole Foods Market Team Members and members of the Board of Directors, as well as consultants and agents doing business for WFM. Please review this Code carefully and be sure that you understand it. If you have questions, please ask your Team Leader or contact the Ethics Committee directly by email at [ethics@wholefoods.com](mailto:ethics@wholefoods.com).

Thank you in advance for your help in making sure that we continue to live up to our high ethical standards.

Best regards,

A handwritten signature in black ink that reads "John Mackey". The signature is written in a cursive, flowing style.

John Mackey

# ABOUT THE CODE OF BUSINESS CONDUCT

## Purpose

The Code of Business Conduct ("the Code") is designed to promote a responsible and ethical work environment for all Whole Foods Market ("WFM" or the "Company") Team Members and members of the WFM Board of Directors ("Board Members"). The Code contains guidelines on proper behavior in the workplace and contact information to be used in the event you have questions or concerns (see "Whole Foods Market Contact Information" at the end of the Code). The Code applies to all WFM Team Members and Board Members, as well as consultants and agents doing business on behalf of WFM.

## Your Responsibilities

In performing your duties for WFM, you are responsible for abiding by WFM policies and all local and national laws in all countries in which the Company does business. You are also obligated to comply with all other applicable laws, rules and regulations of any regulatory organization, licensing agency, or professional association governing your professional activities. You are responsible for knowing and following the laws and policies that relate to your duties, including the policies in the Code and all other Company policies, such as those found in the General Information Guide ("GIG"). If you have questions about specific laws that may apply to your activities or about whether particular circumstances may involve illegal conduct, contact the WFM General Counsel. You should also contact the General Counsel if you think a provision of this Code may conflict with an applicable legal requirement or a provision in the GIG or another Company policy.

Violating the Code or other Company policies may result in corrective action up to and including discharge, and WFM may seek to recover damages or file criminal charges. However, most problems can be easily avoided by simply using good judgment and seeking guidance when questions arise. It is your responsibility to raise questions, make appropriate disclosures and bring potential problems to the Company's attention.

## Obtaining Additional Information

If you have questions about the policies outlined in the Code or would like additional information, talk with your Team Leader, or contact the Ethics Committee directly by email at [ethics@wholefoods.com](mailto:ethics@wholefoods.com) unless a particular provision of the Code says otherwise. Executive officers and Board Members should contact the General Counsel.

## Reporting Code Violations

As part of our shared fate philosophy, we believe that we all share responsibility for ensuring that WFM as a whole conducts itself according to the highest ethical standards and strives to avoid even the appearance of impropriety. If you know of or suspect a violation of the Code, we urge you to report it through one of the means provided in this policy. You may report suspected violations of the Code, and any other ethics or integrity issues, to your Team Leader, by email to the Ethics Committee or by calling the Team Member Tipline. The Team Member Tipline can also be used to report questions or concerns involving the Company's accounting, auditing, financial reporting or internal controls. Reports to the Tipline may be made confidentially and anonymously, although you are encouraged to provide your name to facilitate investigation and follow-up. Neither your Team Leader nor the Company will take any action against you for reporting suspected misconduct in good faith. Information about how to contact the Ethics Committee and the Team Member Tipline appears under "Whole Foods Market Contact Information" at the end of the Code along with other important contact information.

If you are an executive officer or Board Member, you should contact the General Counsel.

Reports of potential misconduct will be taken seriously and investigated promptly and thoroughly. Except where disclosure is required to investigate a report or by applicable law or legal process, all reports will be kept confidential to the extent reasonably possible.

## **No Retaliation**

It is against Company policy, and in some cases against the law, for the Company to take any action against a Team Member or a Board Member, vendor or agent of the Company for reporting or threatening to report a violation of this Code or cooperating in investigations relating to Code violations, provided that the person has acted in good faith and with a reasonable belief that the information provided is true.

## **Waivers**

Waivers of this Code will be granted only in exceptional circumstances. The provisions of this Code may only be waived by the Ethics Committee or, in the case of executive officers and Board Members, by our Board of Directors or an appropriate Board committee. Any waiver of this Code for an executive officer or Board Member will be promptly disclosed in accordance with applicable legal requirements.

## **Ethics Committee**

The Ethics Committee is responsible for setting policy, reviewing questions and issues submitted by Team Members or others, and promoting awareness of and compliance with the Code of Business Conduct throughout the Company. Although membership may vary over time, the Committee is generally comprised of Global Support leaders in the areas of operations, finance, legal, real estate and internal audit. Team Members may contact the Ethics Committee directly by email.

# CONFLICTS OF INTEREST

## General

All business decisions should be made solely in the best interests of the Company, not for personal benefit. Therefore, you should avoid any actions that create, or appear to create, conflicts of interest with the Company. A "conflict of interest" may occur when an individual's own interests (including the interests of a family member or an organization with which an individual has a significant relationship) interfere or appear to interfere with the interests of the Company.

Many conflicts of interest or potential conflicts of interest may be resolved or avoided if they are appropriately disclosed and approved. In some instances, disclosure may not be sufficient and the Company may require that the conduct in question be stopped or that actions taken be reversed where possible.

Questions about potential conflicts of interest and disclosure of these situations as they arise should be directed to the Ethics Committee or your Team Leader or Team Member Services representative. Executive officers and Board Members should contact the WFM General Counsel.

While it is not possible to list all potential conflicts of interest, several examples of different situations are presented in the sections below. Regional policies may also apply to the situations described below, and Team Members should consult their GIG for information about any such policies.

## Gifts & Entertainment

Team Members and Board Members should not give anything of value to anyone, or accept anything of value from anyone, when doing so might compromise or appear to compromise the objectivity of business decisions. Except as specifically noted below, this includes giving to, or accepting from, a current or prospective supplier, vendor, vendor representative (including but not limited to organizations representing multiple producers, such as a regional food group), landlord or competitor of the Company any gifts, entertainment or any form of compensation. Team Members are prohibited from receiving any samples or gifts at home – all samples and gifts must be sent to their primary work location. Team Members and Board Members are prohibited from accepting any loans or services from any WFM vendor who is not otherwise in the business of providing such loans or services, and any such loans or services provided must be provided on fair market value terms. Team Members and Board Members are prohibited from buying products directly from any WFM vendor at a discounted rate not available to all Team Members.

Some gifts and entertainment are allowed as follows:

- (1) Gifts with an established value of \$25 or less are generally allowed.
- (2) Business-related meals of nominal value are allowed, subject to specific requirements in the GIG.
- (3) Gift baskets or flowers may be accepted within reason, but they must be made available for sharing with everyone at the Team Member's store or location.
- (4) Promotional items, such as those bearing a vendor's logo, may be accepted up to total estimated value of \$25.

## EXAMPLES

**Question:** A Vendor offered me a ticket to a sporting event that the vendor is also planning to attend. Can I accept it? It is part of a season ticket package that the vendor purchased for client entertainment.

**Answer:** Accepting a gift valued at U.S. \$25 or more from a vendor is a violation of Company policy. You may not accept the ticket if the face value of the ticket is \$25 or more. You should either decline the ticket or give the vendor a personal check for the full face value of the ticket. In any event, you should advise the vendor about our policies regarding conflicts of interest.

**Question:** A vendor typically sends me a holiday gift basket which, while not extravagant, likely costs more than \$25. What should I do with it?

**Answer:** You may accept the gift basket as long as it would be considered of nominal value, but you should share the contents with everyone at your location. A gift basket with extravagant items should be returned to the sender, with an explanation of our policies regarding conflicts of interest.

**Question:** A vendor has offered to provide logo items (shirts, golf balls, etc.) to be given as prizes for our region's annual golf outing. The total value of the prizes will not exceed \$25/person when considering the number of Team Members that will attend the outing. Is this permissible?

**Answer:** Yes. The value of these items taken together will not exceed \$25/person and therefore may be accepted. No vendor should ever be solicited to provide gifts of this type.

- (5) Existing Team Members may accept samples of new or reformulated products, and new Team Members may accept samples of existing products (one time only). It is not acceptable for Team Members to receive for their personal use multiple samples of the same product from a vendor.
- (6) No Team Member may accept any vendor-paid trip unless an exception is granted. Travel paid for by a consortium of vendors or a trade association/organization is allowed if approved by a Global Vice President or Regional President or above. Travel paid for by a government agency or organization must be approved by a Global Vice President or Regional President and the General Counsel. For exceptions to this vendor paid travel policy, please send an e-mail to the Ethics Committee at [ethics@wholefoods.com](mailto:ethics@wholefoods.com).

If someone tries to give you a prohibited gift, you should also tell your Team Leader. Then, either return the gift or personally reimburse the giver of the gift for its full value.

## EXAMPLES

**Question:** A Team Member on the Front End team creates greeting cards which he sells to the Whole Body team. Is this permitted under the code?

**Answer:** Yes. Since the Team Member is on a different team than the one purchasing the products this is a permitted situation, and it should be monitored by the STL and regional Whole Body Coordinator.

**Question:** An STL has a side business and has created a line of gourmet mustards that several stores in his region are interested in carrying. Is this permitted under the Code?

**Answer:** Yes. The STL's scope of making purchasing decisions is assumed to extend only to his own store, so he may sell to stores other than his own without conflict. To sell to his own store, he must first obtain the approval of the Ethics Committee.

**Question:** The regional Construction Coordinator's brother is a carpenter and has bid on some millwork being installed in several stores during their remodels. If his is the winning bid, would he be permitted to do the work under the Code?

**Answer:** No. Assuming the Construction Coordinator has oversight of the remodels including making purchasing decisions, this would be considered a conflict that would not be permitted under the code.

## Doing Business with Spouses, Relatives, Friends or Your Own Business

Team Members and Board Members should not use their positions at WFM for personal gain. Generally, it is not permissible to conduct business with a Team Member or Team Member's spouse, relatives or friends if the Team Member's role allows him or her or a Team Member that he or she directly supervises to make purchasing decisions for the team, store, facility or region where he or she works. Team Members with any concerns about improper influence are encouraged to contact the Ethics Committee, or, if the situation involves a member of WFLN or a Board Member, the WFM General Counsel. Other Team Member/vendor relationships should be evaluated as follows to determine whether they are permitted:

a) ***Investment in a company that is a vendor*** – This is allowed as long as the Team Member or someone the Team Member directly supervises does not make the purchasing decisions surrounding these products.

b) ***Team Member has a business and sells products to WFM*** – This is allowed as long as the Team Member or someone the Team Member directly supervises does not make the purchasing decisions surrounding these products. For example, it would be allowed for a front end Team Member to sell products to the grocery team as long as the Team Member does not impact grocery purchases.

Team Members with any concerns about improper influence are encouraged to contact the Ethics Committee, or, if the situation involves a member of WFLN or a Board Member, the WFM General Counsel.

For permitted situations, it may be necessary to inform the Store or Facility Team Leader and appropriate regional coordinator so that they may monitor and evaluate any relevant changes in circumstances. Board Members and Team Members are prohibited from being involved in any formal or informal negotiations or related discussions between WFM and a vendor when the Board Member or Team Member has any employment relationship, board membership or direct or indirect ownership interest in the vendor.

Additionally, it is considered a conflict of interest for any Board Member or Whole Foods Leadership Network (WFLN) member to hold a 5% or greater interest in any vendor, lender, or major customer of WFM unless approved by the WFM General Counsel.

Team Members (other than executive officers) may apply to the Ethics Committee for approval of particular transactions or situations, and executive officers and Board Members may apply to the WFM General Counsel.

## Outside Employment or Service as Director or Officer

Except in situations permitted under the section above entitled "Doing Business with Spouses, Relatives, Friends or Your Own Business," the Ethics Committee must approve any circumstance in which a Team Member (other than an executive officer) serves as an employee, director, officer, partner, agent or consultant to any WFM vendor, lender or competitor. The WFM General Counsel must approve of any circumstance in which an executive officer serves as an employee, director, officer, partner, agent or consultant to any WFM vendor, lender or competitor.

Team Members may serve on the board of a not-for-profit organization without prior approval, as long as the organization is not related to WFM. A Team Member serving on such a board should be aware of Company policies regarding donations and other payments, which are discussed below.

Any member of the Board of Directors wishing to serve as an employee, director, officer, partner, agent or consultant to any WFM vendor, lender or competitor must obtain approval from the WFM General Counsel.

## Financial Interest in a Competitor

A conflict may exist if a Team Member or Board Member (or any of their immediate family) holds a financial interest in a competitor, other than a financial interest which constitutes not more than 5% of the outstanding voting securities of a competitor. Team Members should contact the Ethics



Committee for guidance on whether a particular financial interest represents a conflict of interest. Executive officers and Board Members should contact the WFM General Counsel. For purposes of this Code, except for WFM itself, a business shall be a 'competitor' if it is engaged in the ownership or operation of any retail supermarket, retail food store, retail natural food enterprise, or other retail outlet associated with natural foods; it being understood that a business which is predominately manufacturing or wholesaling in foods with less than 10% of their revenue derived from retail sales, or which is a restaurant business, shall not be deemed competitive.

## **Donations and Other Payments**

Team Members and Board Members are prohibited from authorizing donations or other payments from WFM to outside organizations such as not-for-profits with which they or a member of their immediate family serve as an officer or employee. Additionally, any donation in excess of \$50,000 per year shall be approved by two or more of the Company's executive officers. No contributions, gifts or payment may be made from WFM to any political party, candidate, lobbying organization, etc. without the prior approval of the CEO.

## **Opportunities Related to the Company's Business**

Team Members and Board Members may not take for themselves opportunities related to the business of WFM or opportunities that they discover through their positions with WFM or through the use of WFM property or information.

## **Extensions of Credit**

Team Members and Board Members are prohibited from extending any form of credit from WFM to any organization with which they or a member of their immediate family have a personal affiliation. Further, no extension of credit from WFM may be made to any organization without the specific prior approval of the CEO. The only exceptions to this rule are accounts receivable from customers arising in the ordinary course of business and loan programs previously approved by the CEO.

## **Leasing Property and Equipment**

Any property or equipment lease between WFM and a Team Member (other than a member of the executive team, which is dealt with in the following paragraph) or the Team Member's immediate family or any organization with which they are affiliated other than Amazon.com must be approved by the Ethics Committee.

Any property or equipment lease between WFM and a Board Member, a member of the executive team, the executive's or Board Member's immediate family, or any organization with which they are affiliated other than Amazon.com must be approved by the WFM General Counsel.

## **Consulting and Other Professional Services**

Team Members and Board Members are prohibited from providing consulting or other professional services to WFM for payment outside of their normal compensation.

Any situation in which WFM would retain the services of a professional services firm with which a Team Member (other than a member of the executive team, which is dealt with in the following paragraph) or a Team Member's immediate family is affiliated must be approved by the Ethics Committee.

Any situation in which WFM would retain the services of a professional services firm with which a Board Member, a member of the executive team, or a Board Member's or executive's immediate family is affiliated must be approved by the WFM General Counsel.

Examples of professional services include (but are not limited to) accounting, auditing, architectural or design, engineering, investment or commercial banking, legal services, project management and computer programming.

# LEGAL COMPLIANCE

## Bribes and Improper Payments

WFM has enacted an Anti-Bribery Policy which applies to all Team Members, Board Members and agents and representatives of WFM. No Team Member or third party acting on WFM's behalf may offer, give or receive a bribe under any circumstances. This applies to every Team Member at every level at every location. A bribe is not limited to a cash payment. Bribes can also include anything of value, such as discounts, services, gifts, charitable or political contributions, travel, and excessive meals and entertainment. Bribery is not only prohibited under WFM's policy, but it is also against U.S. law and against the law in some countries where WFM does business.

If a vendor or government official implies that a bribe is just the way business gets done in his or her country, the answer is simple: WFM does not do it. WFM has the same standards for international business that we do for business we conduct in the U.S.

WFM could be responsible for the actions of third parties acting on its behalf. Accordingly, all contracts or arrangements with third parties acting on behalf of WFM must be conducted with due diligence to ensure that the third party is capable of complying with WFM's Anti-Bribery Policy.

Team Members, Board Members and agents and representatives of WFM should consult and comply with the WFM Anti-Bribery Policy. Any Team Member, Board Member or agent or representative of WFM who knows of or suspects any non-compliance with the Anti-Bribery Policy or any applicable anti-bribery law should report the incident or suspicion to the General Counsel or anonymously via email to [ethics@wholefoods.com](mailto:ethics@wholefoods.com).

### EXAMPLE

**Question:** Can I tip a local government office worker for agreeing to process our application for a permit needed to open a new store more quickly?

**Answer:** No. You may not tip any government worker in any country.

## Antitrust Laws

Team Members are required to comply with the antitrust and competition laws of the countries where we do business. In general, WFM Team Members must avoid agreements, understandings or plans with competitors that limit or restrict competition, including price fixing and allocation of markets.

## Fair Dealing

Team Members and Board Members should always deal fairly with WFM's customers, suppliers, vendors, competitors and employees. They should not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, falsification, misrepresentation of material facts or any other practice involving intentional unfair dealing. This provision does not alter existing legal relationships between the Company and its Team Members, including any at-will employment arrangements.

## Complaints to Government Agencies

Occasionally, a job applicant, customer, or current or former Team Member may file or threaten to file a complaint against WFM with the government. If a Team Member or Board Member is notified about such a complaint, they should immediately contact the General Counsel.

## **Workplace-Related Laws and Policies**

Team Members should consult the GIG for information regarding the Company's equal employment opportunity policy and compliance with other employment-related laws and policies such as the Immigration Reform and Control Act of 1986 and the Health Insurance Portability and Accountability Act (HIPAA), as well as Company policy on drugs and alcohol, workplace violence, weapons, harassment, open door communications, solicitation and distribution, and nepotism and favoritism.

# COMPANY INFORMATION AND ASSETS

## **Confidentiality**

Team Members and Board Members are expected to protect confidential or proprietary information about WFM, Amazon.com or its subsidiaries, to use this information only for business purposes, and to limit dissemination of the information (both inside and outside WFM, Amazon.com, and its subsidiaries) to those who have a need to know the information for business purposes.

Team Members and Board Members are also expected to protect any confidential or proprietary information that comes to them, from whatever source, in the course of performing their responsibilities for WFM. This includes information received from or relating to third parties (such as vendors) with which WFM has or is contemplating a relationship.

Confidential or proprietary information includes all non-public information relating to WFM, Amazon.com and its subsidiaries or a third party. Examples include material non-public information about store operating results, new store development plans, and most Team Member information. If you are unsure whether information is confidential, contact your Team Member Services representative or email the Ethics Committee. Team Members should consult the GIG for information about additional policies on confidentiality.

## Insider Trading Policy

Federal and state laws prohibit trading in securities by persons who have material information that is not generally known or available to the public.

Team Members may not a) trade in stock or other securities while in possession of material nonpublic information or b) pass on material nonpublic information to others without express authorization by Amazon.com or recommend to others that they trade in stock or other securities based on material nonpublic information.

Amazon.com has adopted guidelines designed to implement this policy. All Team Members are expected to review and follow the Amazon.com Insider Trading Guidelines applicable to Whole Foods Market. Certain Team Members must comply with trading windows and/or preclearance requirements when they trade Amazon.com securities.

## Media Inquiries

Team Members may not speak to reporters or members of the media on behalf of the Company without going through the proper channels, as doing so may risk providing incorrect information or revealing proprietary strategies. Inquiries made to Team Members from members of the media should be directed to your Regional Marketing Coordinator, Regional PR contact, or to the Global Communications Team.

Board Members should consult the Director Media Policy prior to speaking with any reporter or member of the media about the Company.

## Online Forums

The Company realizes the importance of communicating proactively and responsively on the Internet and at the same time the importance of communicating responsibly—i.e., avoiding misrepresentations of facts as well as the intentional or inadvertent violation of laws, regulations or company policies. Accordingly, we have a strict policy regarding postings by Company Leadership to non-Company-sponsored Internet chat rooms, message boards, web logs (blogs), or similar forums, concerning any matter involving the Company, its competitors or vendors, as follows:

- Postings by a member of Company Leadership must be approved by Chief Financial Officer or General Counsel. A posting by any of these three individuals must be approved by one of the other two.
- Any postings which refer to a governmental agency or any legal matter must be approved by the GC.
- Postings made anonymously, under a screen name or through another person are prohibited.

Violation of this policy will be grounds for dismissal. For purposes of this policy, "Company Leadership" includes each Company Board Member, Executive Team Member, Global Vice President and Regional President. For other Team Members, other policies may apply and they should consult their GIG.

## Financial Integrity; Maintaining Books and Records

Accurate records are essential to the successful operation of WFM. Team Members are responsible for preparing accurate and complete Company records, information and accounts. For example, claims on an expense report or time record, payments and other transactions must be correctly recorded and accounted for, and properly authorized in accordance with Company policies.

All business records should be clear, truthful and accurate. Keep in mind that business records and communications may become subject to public disclosure through government investigations, litigation or the media. Business records are Company assets and must be retained or destroyed in accordance with applicable policy.

Team Members must act to promote full, fair, accurate, timely and understandable disclosure and reporting of Company information, including the Company's financial results and financial condition, in reports and documents that the Company or Amazon.com files with or submits to the Securities and Exchange Commission and other government agencies, and in the Company's and Amazon.com's other public communications. All Team Members must comply with Company policies, procedures and controls designed to promote accurate and complete recordkeeping. Accounting for, and financial reporting of, actual transactions and forecasts must follow the Company's accounting policies as well as all applicable generally accepted accounting principles and laws.

If you have questions or concerns about the Company's accounting, auditing, financial reporting or internal controls, you may contact your Team Leader, email the Ethics Committee or call the Team Member Tipline.

### **No Improper Influence on Audits**

All Team Members and Board Members are expected to cooperate fully with WFM's internal and external auditors. You must not directly or indirectly take any action to coerce, manipulate, mislead or fraudulently influence any public accountant engaged in the performance of an audit or review of WFM's financial statements. Further, any Team Member involved in the preparation of financial statements or WFM's independent audit should avoid a personal relationship with any member of the audit engagement team, other than a casual friendly relationship.

### **Company Property**

WFM property (for example, inventory, supplies and equipment) should be used for business purposes. WFM property should be cared for and used responsibly, and it should be protected from misuse, improper disclosure, theft and destruction. Taking or using Company property of any value for personal purposes without appropriate permission from the Company is stealing. However, using WFM property (such as telephones, computers and fax machines) for incidental personal activities is permitted. Regional policies also apply to the use of various kinds of Company property, and Team Members should consult the GIG for information about these policies.

# WHOLE FOODS MARKET CONTACT INFORMATION

Team Member Tipline for Team Members in the U.S. or Canada	1-888-662-5025
Team Member Tipline for Team Members in the U.K.	0808-234-5713
WFM Ethics Committee	<a href="mailto:ethics@wholefoods.com">ethics@wholefoods.com</a>
CEO John Mackey	1-512-542-0215 <a href="mailto:john.mackey@wholefoods.com">john.mackey@wholefoods.com</a>
WFM General Counsel	1-512-542-0700 <a href="mailto:legal@wholefoods.com">legal@wholefoods.com</a>
Global Communications Team	1-512-487-9333 <a href="mailto:media@wholefoods.com">media@wholefoods.com</a>

# APPENDIX

## **Our Core Values**

Our Core Values reflect what is truly important to us as an organization. They represent our deeply held beliefs, and we use them to guide us fulfilling our mission and higher purpose as a company. Our six stated Core Values are as follows:

- We sell the highest quality natural and organic foods
- We satisfy and delight our customers
- We promote Team Member growth and happiness
- We practice win-win partnerships with our suppliers
- We create profits and prosperity
- We care about our communities and the environment

## **Our Quality Standards**

Our unparalleled Quality Standards ensure that the food, supplements, body care and cleaning products we sell meet a higher standard. All Team Members are responsible for upholding our Quality Standards in their business practices and job duties. For an overview of our Quality Standards please see <https://www.wholefoodsmarket.com/quality-standards>.

## **Code of Business Conduct Amendments**

On May 4, 2018, Whole Foods Market amended the Code of Business Conduct to clarify examples regarding gifts and the policy regarding outside employment or service with vendors, update the policy regarding vendor-paid trips, and update the Code's Appendix. On August 28, 2017, Whole Foods Market amended the Code of Business Conduct regarding review or approval of certain matters by the General Counsel and regarding the preclearance by WFM executive officers of certain securities transactions.