

# Whole Foods Market Supplier Code of Conduct

At Whole Foods Market, we are committed to providing products and services that are produced or supplied 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 these same principles. Whole Foods Market Supplier Code of Conduct (the “Standards”) applies to all suppliers of goods and services for Whole Foods Market and Whole Foods Market’s subsidiaries, including providers, vendors, selling partners, contractors, and subcontractors (“Suppliers”). Our commitment and approach are informed by leading international standards and frameworks developed by the United Nations (UN) and the International Labour Organization (ILO). Whole Foods Market is committed to respecting and supporting the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, the Core Conventions of the ILO, and the ILO Declaration on Fundamental Principles and Rights at Work. These Standards are derived from the above internationally recognized principles, standards, and frameworks. When interpreting these Standards, we follow UN and ILO guidance materials and definitions.

All products sold in the Whole Foods Market Stores or products or services provided to Whole Foods Market must be manufactured, produced, or provided in accordance with these Standards and all applicable laws. Suppliers are required to conform to our Standards, even when our Standards exceed the requirements of applicable law.

Suppliers must follow all applicable laws and regulations and must support Whole Foods Market to do the same, including by complying with any requests from Whole Foods Market related to compliance with laws and regulations. When applicable law conflicts with these Standards, Suppliers must follow the law while finding ways to respect the principles of internationally recognized human rights and the expectations contained in the Standards.

In our application of these Standards, we use the following key principles:

*Inclusivity:* Suppliers must apply our Standards to all workers without discrimination and regardless of workers’ personal characteristics or legally protected status. We recognize that certain groups may be disproportionately impacted by issues addressed in our Standards and may be more vulnerable to exploitation and other human rights and environmental impacts (e.g., women, children, indigenous people, temporary or migrant workers). We are committed to addressing risks specific to these groups and working with Suppliers to evaluate and address circumstances that may arise but are not specifically covered by our Standards. We encourage Suppliers to implement additional policies and practices designed to advance equity and inclusivity for all workers.

*Continuous improvement:* Whole Foods Market operates on a policy of continuous improvement, and we are committed to working with Suppliers to embed respect for human rights and the environment in their operations and supply chain, improve protections for their workers and workplace, and address nonconformance with these Standards. We strive to always put the interests of workers first. We encourage, or if required by law, require, Suppliers to engage in

human rights and environmental due diligence to identify, prioritize, and address their most salient risks, adopting and maintaining effective management systems as outlined in these Standards. The size and structure of the Suppliers (e.g., family farms, smallholders, homeworkers) will be taken into consideration when driving continuous improvement in line with these Standards, to the extent permitted by law.

*Supply chain accountability:* Upon request, Suppliers are required to disclose indirect hiring practices and any of their own suppliers, contractors, subcontractors, recruitment agents, or labor agents connected to the provision of goods or services to Whole Foods Market. We are committed to working with Suppliers to help them understand our Standards. Suppliers are required to hold their own suppliers, subcontractors, recruitment agents, and labor agents to applicable laws and these Standards, and to work with them to adopt and raise awareness of these Standards. We encourage Suppliers to do this through training and other means. Suppliers should engage in remediation of issues, and we will work with Suppliers as they work to end, minimize, or mitigate a violation or an adverse impact of an issue. We reserve the right to temporarily suspend or terminate a relationship at any time for failure to meet our Standards. Termination will be considered as a last resort, for reasons including 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. We encourage Suppliers to utilize credible third-party certifications, including for materials, production processes, and products, where applicable.

## **Labor Rights**

1. **Work done by Young Persons and Child Labor.** Whole Foods Market does not tolerate the use of child labor. Suppliers are required to engage workers who are: (i) at least 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. Workers under the age of 18 (“young workers”) must not perform hazardous work, including that which is likely to jeopardize their health or safety, or work that compromises their education (e.g., night shifts, overtime). Suppliers employing young workers must follow all local laws related to hours of work. Suppliers should implement an age verification mechanism. Young workers should not be deprived of right to benefit from social security, including social insurance. Suppliers should provide support and training to young workers, with special attention to the access young workers shall have to effective grievance mechanisms and to health and safety information. Cases of child labor must be remediated, including through corrective measures that facilitate the child’s safety and wellbeing.

*Light Work.* In accordance with international labor standards, light, non-hazardous work is permitted only if the child performs the work for 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. Suppliers should maintain documentation to verify that any light work is performed according to legal requirements.

2. **Student Workers, Interns, and Apprentices.** Whole Foods Market supports the development of legitimate workplace apprenticeship programs that support the students' educational goals and comply with Whole Foods Market's Standards and applicable laws and regulations. Minimum age requirements under these Standards must also be met for all persons engaged in any workplace apprenticeship programs. Suppliers are required to carefully manage student worker programs 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. Suppliers should give students information about how and when the apprenticeship ends and any opportunities available, to enable students to make an informed decision on whether to participate in full-time employment. We encourage adoption of programs that facilitate participation from underrepresented groups (e.g., women).
3. **Involuntary or Forced Labor, Human Trafficking, and Modern Slavery.** 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. Workers must be free to leave work and terminate their employment or other work status with reasonable notice, without penalty. There shall be no unreasonable restrictions on workers' freedom of movement in any Supplier-controlled facility.

*Recruitment and related fees.* Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees or costs for their employment either in their home country, any intermediate country, or the country where work is performed. Suppliers should recruit workers in a manner that prevents worker-paid fees. Suppliers may not require workers to make any financial deposits into accounts. If workers have paid fees in violation of these Standards, Suppliers are required to bear or reimburse to 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. Repayment of worker-paid fees should be done in a manner that protects workers and their families from harm and retaliation. All fees and expenses charged to workers must be disclosed to Whole Foods Market and communicated to workers in their native language and in advance of employment or work.

*Third party agents.* These Standards also apply to third-party labor agents or brokers. 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 require that staffing or recruiting agencies comply with our Standards, as well as all applicable laws of the country where work is performed and the worker's home country, including ascertaining the right to work.

*Personal identification documents.* Suppliers must not cause workers to lose possession of or access to their personal documents. Suppliers must not hold (for safekeeping), destroy, conceal, confiscate, or require workers to surrender government issued identification, passports, immigration documents, or work permits to any party, including third party agents. Suppliers may only temporarily hold onto such documents to the extent required by law to complete administrative and immigration processing. Suppliers may provide individual, lockable storage facilities in workers' accommodations (if applicable) for workers to store these documents and personal items, but unless permitted by law, the Supplier may not access the storage facilities while in use by a worker.

*Terms and Conditions.* Before they enter into employment or prior to departing their country of origin, 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, with preference for the worker's native or best-understood language and/or visual images for workers with lower literacy levels. These terms and conditions may not be altered upon the start of employment or departure from the worker's country of origin unless made according to law and containing better terms for workers.

*Worker records.* Suppliers are required to keep up-to-date records of all employees, particularly migrant workers; this includes the basic contract terms, the workers' arrival and departure dates, and worker age. Suppliers are also encouraged to keep records of gender data and worker emergency contacts.

4. **Migrant Workers.** Suppliers should pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face. Suppliers must respect migrant workers' rights and not discriminate against migrant workers. Migrant workers must have the same employment protections and rights afforded to local employees, where legally permissible. 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.
5. **Wages and Benefits.** Suppliers are required to pay their workers, including contract workers and those paid by piece rate, in a timely manner and provide compensation (including minimum wages and allowances, overtime pay, benefits, and paid leave) in a manner that satisfies or exceeds applicable laws. In countries where such laws do not exist, Suppliers are encouraged to pay wages that meet or exceed industry average, pay overtime at a rate exceeding the regular hourly compensation rate, and maintain policies that provide worker benefits, such as leave. Suppliers are required to provide equal pay for work of "equal or comparable value", without discrimination. Suppliers must show upon request that legal wages for regular and overtime hours are correctly calculated. Suppliers should regularly review worker salaries to evaluate whether workers earn enough to meet their basic needs

and the needs of their family and adjust accordingly at least every two years.

*Pay Methods.* Suppliers are required to provide their workers with timely pay stubs or similar documentation that includes an explanation for the basis of their compensation in a manner that workers can understand. Deductions from wages as a disciplinary measure are not permitted. Suppliers are encouraged to transition from cash payments to digital wage payment systems.

*Benefits and leave policies.* Suppliers must provide benefits and leave to all workers in accordance with legal requirements. Suppliers should have a parental leave policy that reflects those requirements and clearly outlines any additional protections and benefits provided during parental leave and during pregnancy/before parental leave. Even where the law is silent, we encourage Suppliers to provide workers with paid leave, including for rest and leisure time, vacation, public holidays, and parental leave. We encourage Suppliers to offer parents or caretakers of young children on-site childcare facilities or subsidies and adequate, flexible working arrangements.

6. **Working Hours.** Suppliers should regularly monitor working hours to maintain the safety, health, and welfare of workers. Except in special or emergency situations, (i) Suppliers are required to limit working hours to no 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. Suppliers are required to provide workers with legally required breaks, or reasonable breaks where the law is silent.

*Overtime.* Suppliers are encouraged to consider religious norms (e.g., religious holidays) when offering overtime to workers. Suppliers should provide workers with adequate notice of overtime shifts.

7. **Anti-discrimination.** Whole Foods Market Suppliers must not discriminate on the basis of race, color, national origin, sex, gender identity, sexual orientation, religion, creed, the presence of any physical, sensory, or mental disabilities, age, political opinion, pregnancy, citizenship, migrant status, veteran status, ethnicity, ancestry, caste, marital or family status, or legally protected statuses in hiring and working practices such as recruitment, job applications, promotions, job assignments, training, wages, benefits, and termination.

Suppliers are prohibited from inquiring about a worker's marital, pregnancy, or parental status as a criterion for hiring or continued employment. Suppliers must not request or require pregnancy, virginity, or HIV tests, and they must not coerce or pressure women to use or not use contraception or discriminate against them for their reproductive choices. All medical tests required of workers or applicants must not be used in a discriminatory manner.

Suppliers are required to make reasonable disability, religious, or pregnancy-related accommodations without discriminatory impact on pay or level of employment. Suppliers must have an equal opportunity employment policy that promotes gender equity in employment practices. Suppliers must not discriminate against people who are pregnant,

lactating parents, or workers returning from parental leave, and Suppliers should have a parental leave policy that prohibits this.

We encourage Suppliers to develop policies and practices that facilitate representation and promote diversity, equity, and inclusion. We encourage Suppliers to assess their company culture for risk of discrimination and harassment and implement management plans and training to address any risk. We encourage Suppliers to provide programs for underrepresented workers (e.g., women) to increase their opportunities for career advancement.

8. **Anti-Harassment and Abuse.** All workers must be treated with respect and dignity. Suppliers must not engage in or tolerate violence, harassment, abuse, or coercion, including physical, verbal, sexual, or psychological, or any form of torture or cruel, inhuman, or degrading treatment. These include threats of violence, corporal punishment, mental coercion, sexual harassment, gender-based violence, unreasonable restrictions on entering or exiting work and residential facilities, arbitrary arrest or detention, or any other forms of intimidation. We encourage Suppliers to implement policies that prohibit these activities and to communicate it to all workers in their native language. We encourage Suppliers to provide gender-sensitive sexual harassment and gender-based violence training to all managers, supervisors, and workers.
9. **Grievance Mechanism and Reporting.** All workers must be free to voice their concerns and seek resolution of issues covered by these Standards in a confidential and anonymous manner free from retaliation. Suppliers are required to create and maintain an equitable and effective grievance mechanism, for workers to submit their grievances. Suppliers must maintain an effective resolution process, clearly communicated to workers, to timely 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.

Workers must also be free to voice their concerns about issues related to our Supplier Code of Conduct Standards to Whole Foods Market or Whole Foods Market's auditors including through confidential worker interviews and allowed to participate in the audit process without fear of retaliation.

10. **Freedom of Association.** Suppliers must respect the rights of workers to form, join, or refrain from joining, a labor union or other lawful organization of their own selection. Suppliers must respect workers' rights to freedom of association and collective bargaining. Workers must not be penalized or subjected to reprisal, harassment, or intimidation for the non-violent exercise of these rights.

## **Health and Safety**

1. **Health and Safety.** Suppliers are required to provide workers with a safe and healthy work environment that avoids harm to workers' physical and mental health. Suppliers must comply with applicable laws regarding occupational safety, working conditions, and health standards. Where required by law, Whole Foods Market requires that Suppliers facilitate worker health and safety committees, post health and safety information in a location and language accessible to workers, and provide health and safety training to workers at the beginning of employment and regularly thereafter, including on emergencies and injuries that occur in the workplace. Where the law is silent, we encourage these best practices. Whole Foods Market encourages Suppliers to approach workplace violence in a manner that is gender inclusive.
2. **Safe Working Conditions, Occupational Safety, and Industrial Hygiene.** Suppliers must maintain safe working conditions, including by providing safe Supplier-controlled facilities, facility infrastructure, and machines. Facilities and Supplier-controlled worker environments must meet all legal requirements and must be structurally sound with adequate strength of materials, professionally designed for risks from seismic activity, wind, and other natural disasters. We do not tolerate buildings in imminent risk of collapse or working environments that pose an immediate threat to life, including because of uncontrolled fire, electrical, mechanical, chemical, and biological hazards.

We require that Suppliers monitor workers' potential for exposure to health and safety hazards (e.g., chemical, biological, mechanical, electrical and other energy sources; physical agents; fire; vehicles; fall hazards). Suppliers are required to identify, assess, and mitigate these hazards using best practices. This may include eliminating the hazard; substituting processes or materials; controlling through proper design; implementing engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout); and providing ongoing occupational health and safety training. Where hazards cannot be adequately mitigated by these means, Suppliers are required to provide workers with appropriate, well-maintained, personal protective equipment free of charge, together with training on when and how to use the equipment correctly. Workers who work with (or are otherwise exposed to) hazardous or dangerous conditions or materials must be informed of risks to them associated with these hazards and receive appropriate training in advance and on a continual basis. Suppliers should monitor for workplace health and safety risks that may impact people who are pregnant or lactating and take reasonable steps to remove or mitigate these risks, inform them of any hazards, and provide reasonable accommodations.

*Occupational Injuries and Illnesses.* Suppliers are required to put procedures and systems in place to prevent, manage, and track occupational injuries and illnesses; encourage worker reporting; classify and record injury and illness cases, provide necessary medical treatment, investigate cases, implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Necessary medical treatment means that at a minimum, in case of any work-related injury and/or illness, Suppliers must provide workers with first aid and information regarding affordable and accessible health services. Where required by law,

Suppliers must provide on-site health facilities with qualified health professionals for any health-related emergencies.

3. **Physically Demanding Work.** Suppliers are required to continually identify, evaluate, and control physically demanding tasks (including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful work) to help ensure that worker health and safety is not jeopardized. If workplace conditions could result in harm from heat or cold stress, workers must be provided with adequate heat, ventilation, PPE, rest options, sun protection (e.g., shade), and/or hydration. We encourage Suppliers to establish practices that enable workers to take adequate rest and water breaks during their shifts, taking into account the environment and the physical demands of the tasks.
4. **Emergency Preparedness and Response.** Suppliers are required to identify and plan for emergency situations by implementing response systems and emergency plans and training their workers on them at least annually. We require response systems and emergency plans to include emergency reporting; alarm systems; worker notification and evacuation procedures; worker training and drills; first-aid supplies; fire detection and suppression equipment; unblocked, unobstructed, and unlocked exit facilities; contact information for emergency responders; and recovery plans. Suppliers are encouraged to develop plans and procedures that focus on minimizing harm to life, the environment, and property.
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 are required to provide properly maintained machinery controls (e.g., physical guards, interlocks, barriers) when machinery presents an injury hazard to workers.
6. **Sanitation and Hygiene.** Suppliers must provide workers with safe, sanitary conditions in all Supplier-controlled worker environments. Workers must have reasonable and unrestricted access to basic hygiene facilities (e.g., handwashing stations, safe potable drinking water, clean toilet facilities, waste receptacles) at all Supplier-controlled worker environments. We encourage Suppliers to provide toilet facilities that accommodate the number of workers and privacy for the individual. We encourage toilets (and showers, if applicable) to be separate for workers of different genders. If Suppliers provide a canteen or other food accommodations, they must include sanitary food preparation, storage, and eating facilities, and we encourage Suppliers to provide all workers with reasonable physical access to any food accommodations.
7. **Housing.** If Suppliers provide residential facilities/housing to accommodate their workers and/or staff, the facility is considered a Supplier-controlled worker environment and Suppliers must provide clean and safe accommodations that respect workers' privacy and satisfy all applicable legal requirements and these Standards. Any housing provided must qualify as a dedicated residential space, physically separate from any production area. Residential facilities must be structurally safe, clean, and sleeping quarters must be separate



for workers of different genders. Residential facilities must be free of hazards that can immediately threaten worker lives. Residential facilities must be equipped with fire alarm, detection, and suppression equipment. At all residential facilities, workers must be provided with adequate means of egress in case of emergency, reasonable and secure personal space, reasonable entry and exit privileges, reasonable access to hot water for bathing, lighting and electricity, adequate heat and ventilation, training to deal with emergency situations in a residential space, security, and reasonable transportation to and from work facilities (if not reasonably accessible by walking).

## **Environment**

1. **Environment.** Suppliers should respect the right to a clean, healthy, and sustainable environment. Suppliers are required to comply with applicable environmental laws and regulations. Suppliers should minimize adverse impacts on the environment (including reducing the use of energy, air emissions, greenhouse gas emissions, waste, use of water, pollution, and hazardous materials). Suppliers are encouraged to engage in efforts that support environmental sustainability, such as conducting environmental due diligence and making progress towards integrating environmentally sustainable practices throughout their operations and supply chain.
2. **Energy Consumption and Greenhouse Gas Emissions.** We encourage suppliers to continuously improve energy efficiency and reduce energy consumption and greenhouse gas emissions. Suppliers should track, document and, upon request, report greenhouse gas emissions to Whole Foods Market. Suppliers are encouraged to establish a greenhouse gas reduction goal and publicly report against their progress.
3. **Environmental Permits and Recordkeeping.** Suppliers are required to obtain and keep current all necessary environmental permits, approvals, and registrations and follow applicable operational and reporting requirements.
4. **Effective Management and Disposal of Hazardous Substances.** Suppliers must comply with all applicable laws and regulations regarding the prohibition or restriction of specific substances in products, manufacturing, operations, and services. Suppliers are required to effectively identify and manage the safe handling, movement, storage, and disposal of hazardous substances (e.g., chemicals and materials) that pose a threat to humans or the environment. Suppliers must provide workers with appropriate training on the safe-handling and disposal of hazardous substances.
5. **Effective Resource Management.** Suppliers should implement effective management systems. Management systems must comply with regulatory requirements and should facilitate optimal performance. At Whole Foods Market's request, suppliers are required to demonstrate that required management and control systems are performing properly.

*Pollution Prevention.* Suppliers are encouraged to add pollution control equipment and/or

modify production, maintenance, and facility processes to help minimize or eliminate air and greenhouse gas emissions, the discharge of pollutants, and generation of waste.

*Resource Conservation.* Suppliers should reduce fossil fuel consumption, and we encourage Suppliers to reduce consumption of other natural resources, including water and minerals, and avoid deforestation. We encourage Suppliers to implement practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, or recycling.

*Water Management.* All wastewater must be identified, routinely monitored, controlled, and treated prior to discharge or disposal in accordance with applicable laws. 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.

*Solid Waste.* Suppliers are required to identify, manage, and responsibly dispose of or recycle solid waste generated from operations in accordance with applicable laws. We encourage Suppliers to reduce 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 substances, and combustion by-products generated from operations as required by law prior to discharge. Ozone depleting substances should be effectively managed in accordance with applicable protocols.

6. **Environmental Justice.** Whole Foods Market encourages Suppliers to assess and address issues of environmental equity and understand Suppliers' environmental impact on people and communities connected with their business. We encourage Suppliers to undertake initiatives seeking to improve the health and well-being of the most vulnerable and marginalized communities, based on any higher burden of environmental exposure from air, water, and soil pollution from industrial and consumer practices that these communities may face.

## **Responsible and Sustainable Material and Commodity Sourcing**

1. **Minerals .** Whole Foods Market is committed to avoiding the use of minerals that have fueled conflict. Suppliers should support our effort to identify the origin of designated minerals used in our products consistent with recognized due diligence frameworks. In line with this due diligence, Suppliers should source from smelters and refiners that have successfully completed a recognized third-party responsible minerals audit.
2. **Material and Commodity Sourcing.** Suppliers should source commodities used in products in a way that respects local communities and protects ecosystems. Suppliers should consistently monitor the social and environmental performance of their upstream suppliers in line with recognized due diligence frameworks and provide supporting documentation at Whole Foods

Market's request.

## Land and Natural Resource Rights

1. **Land and Natural Resource Rights.** Suppliers must respect the legal land rights of individuals, indigenous people, and local communities, inclusive of their established public, private, communal, collective, indigenous, and customary rights over natural resources (e.g., fisheries, forests, and water). Suppliers may not engage in land grabbing or illegal use of land or natural resources in our supply chain. Supplier utilization of land and natural resources, including acquisition, development, or lease are subject to Free, Prior, and Informed Consent (FPIC) of the affected local communities, such as women, indigenous peoples, and other marginalized stakeholders. Upon Whole Foods Market's request, Suppliers are required to demonstrate a legal right to use land and/or natural resources.

## Ethical Behavior

1. **No Bribery.** Whole Foods Market will not tolerate Suppliers that engage in bribery with anyone for any reason, whether involving dealings with government officials or the private sector. This includes offering, promising, authorizing, giving, or accepting anything of value to obtain or provide undue or improper advantages to anyone for any reason. 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, either directly or indirectly, accept from; or offer, give, authorize, or promise to government officials anything of value 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. Suppliers should implement and maintain monitoring, record keeping, and enforcement procedures to maintain compliance with anti-corruption laws.
3. **Whistleblower Protections.** Suppliers must protect worker whistleblower confidentiality and prohibit retaliation against worker whistleblowers, who in good faith report improper conduct (for example, related to environmental or human rights violations, workplace grievances, and unethical business practices) by a Supplier or an employee or officer of a Supplier.
4. **Transparency.** Whole Foods Market requires Suppliers to keep and maintain complete and accurate records about working conditions (e.g., wage and working hour records), subcontractors, and labor agents. Upon Whole Foods Market's request, we require Suppliers to provide accurate chain of custody records for goods and component materials. Whole

Foods Market reserves the right to assess Suppliers to confirm conformance with these Standards. Information regarding a Supplier's labor, health and safety, human rights, environmental, commodity sourcing, ethical, or management practices must be disclosed upon Whole Foods Market's request, where necessary to demonstrate conformance with these Standards or in accordance with applicable regulations. Suppliers will cooperate with any information requests or assessments Whole Foods Market may initiate to confirm their fulfillment of these responsibilities or meet our own disclosure and reporting obligations. Suppliers must not falsify records or misrepresent conditions or practices in the supply chain.

5. **Privacy and Data Protection.** Suppliers must comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Upon Whole Foods Market's request, Suppliers should disclose use and management of data and information within the scope of the Supplier relationship. Suppliers should not act arbitrarily to interfere with a worker's privacy. Nothing in this section should be interpreted to prevent Whole Foods Market from collecting information under these Standards, unless Suppliers can demonstrate that doing so violates law.
6. **Responsible Artificial Intelligence.** Suppliers that develop (or contribute to developing), train, or use artificial intelligence (AI) must do so according to legal requirements and should strive to follow best practices for responsible AI.
7. **Trade.** Suppliers are required to comply with all applicable import, re-import, sanctions, anti-boycott, export, and re-export control laws. Suppliers must not provide any goods or services to Whole Foods Market if their receipt is restricted or prohibited, including any goods or services originating from a country or manufactured or provided by an individual, corporation, organization, or entity under sanctions, embargoes, or any other restrictions administered by the United Nations, the United States, the European Union, or any other applicable government authority.

## **Management Systems**

1. **Management Systems.** Suppliers should adopt a management system to drive continuous improvement against these Standards, and maintain compliance with applicable laws.

*Management Accountability and Responsibility.* Suppliers should have designated representatives responsible for implementing management systems and programs that oversee compliance with applicable laws, conformance with our Standards, and, where legally required, progress on addressing the Suppliers' most salient human rights and environmental risks. Senior management must routinely review and assess the quality and efficiency of the management systems and programs.

*Risk Management.* Suppliers should establish a due diligence process to identify, prevent, address, mitigate, and account for the environmental, human rights, health, safety, and ethical risks associated with their business practices. Suppliers should develop and track

performance objectives, targets, and implementation plans, adopt self-evaluation mechanisms, and drive continuous improvement. In addition, management must develop appropriate processes to identify, monitor, and understand applicable laws and regulations to control identified risks and maintain compliance. Suppliers are required to continuously monitor and enforce these Standards in their own operations and supply chain, including with subcontractors. Suppliers should self-evaluate and make improvements to meet or exceed our expectations and those of our customers as reflected in our Standards. We encourage Suppliers to continuously assess their risks specific to women and vulnerable groups, including children, indigenous peoples, and temporary or migrant workers.

2. **Training.** Suppliers should maintain appropriate training programs for managers and workers to implement Supplier policies, these Standards, and to comply with applicable legal requirements. We encourage all trainings for managers and workers to be tailored to address issues that disproportionately impact women and vulnerable groups.
3. **Communication and Worker Feedback.** Suppliers should clearly and accurately communicate and educate workers about Whole Foods Market and Supplier 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, worker voice dialogues, 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 potential illiteracy and socio-cultural barriers, and communication and trainings should take these issues into account.
4. **Remediation.** Suppliers should maintain a process for timely remediation of nonconformance identified by internal or external assessments, inspections, investigations, reviews, and reports.
5. **Documentation and Records.** Suppliers are required to create, retain, and dispose of business records in full compliance with applicable legal requirements and to demonstrate conformance with these Standards. Suppliers must maintain 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 and documents necessary to operate, including, for example, licenses (e.g., health and safety permits, occupancy permits, etc.) and required customs records.