

Business Partner Code of Conduct



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introduction.

At Shipt, our company values are at the heart of everything we do. Our commitment to these ethical standards should not only be reflected in *our* actions and the decisions *we* make but also in the actions and decisions of our **business partners**. As a values-driven company, we seek and prioritize partnerships with those who share and uphold our values.

Our members place their trust in us, and we honor that trust through our commitment to doing business ethically and legally. Since the actions of our business partners reflect directly on Shipt, we expect our partners to uphold the highest standards of conduct and to be aligned with Shipt's values. There's a lot at stake: an unethical act or violation of law can have serious consequences for you and for Shipt.

Because we place such a high priority on ethical and legal conduct, all of our business partners must read, understand and agree to the Business Partner Code of Conduct (BPCC or Code), and all Shipt requirements.

While we seek to do business with those that go beyond legal and regulatory compliance and help us achieve our commitments to our shared ethical and social objectives, at a minimum, Shipt requires our business partners and their subcontractors to comply with all laws and regulatory requirements.

If you have questions about any of the information in this Code, or what is expected of you, please email Ethics@Shipt.com.

In addition, if you suspect unethical or illegal business practices, it is your responsibility to report your concerns using the resources outlined on page 8 of this Code.

Thank you for your commitment to upholding our high ethical standards, and for doing your part to maintain the trust of our members, teams, shoppers, stakeholders, and communities.

Shipt is committed to fostering a culture of integrity. Individuals classified as employees by Shipt (Team Members) support that effort and business partners can assist in that effort through practicing ethical conduct. Shipt's Code of Ethics (COE) provides guidance on ethical expectations for Shipt Team Members while this Business Partner Code of Conduct (BPCC) provides Shipt's expectations of business partners on our shared values.

Business partners can demonstrate a commitment to exhibiting a strong ethical culture during its interactions with Shipt by:

- Modeling the culture and values of this BPCC through decisions and actions
- Demonstrating honesty, respect and concern for others during interactions with Shipt
- Understanding and following policies and procedures set out in this BPCC
- Complying with all applicable laws and regulations
- Reporting any suspected violations or concerns

By holding ourselves and each other accountable to these standards, we uphold our shared values and contribute to a culture of integrity. We also ensure that we can deliver on our commitments for the benefit of each other and our respective partners, stakeholders and community.

ethical business practices

Shipt seeks to work with business partners whose values match our own - those that promote diversity and inclusion, hold themselves to high ethical standards, respect human rights, provide a safe and healthy work environment and focus on environmental stewardship. We expect our business partners to share these principles and uphold our standards. Partners must conduct their business with a high level of integrity and maintain transparent and accurate records.

We expect business partners to ensure their vendors, suppliers, third-party sellers, manufacturers, contractors, subcontractors, and their agents (collectively, “Business Partner”) abide by the following standards and cascade them through their supply chain:

Dealing with Shipt Team Members

As outlined in Shipt’s COE, Shipt does not allow any exchange of favors, money, gifts, entertainment, or travel with our Team Members with the intent to influence business decisions. Shipt Team Members are also prohibited from engaging in solicitation of anything of value from business partners. Shipt business partners shall not encourage nor cause a Shipt Team Member to violate the COE.

License and Permitting

Business partners must acquire and maintain all business necessary and legally required licenses, permits, certifications and approvals required for production of their products and operation of their facilities and business.

Shipt will not tolerate business partners operating without valid current permits, licenses, etc.

Anti-Corruption

Business partners are required to comply with all applicable laws including but not limited to the U.S. Foreign Corrupt Practices Act. Under no circumstances may a business partner working for or on behalf of Shipt offer, promise, or provide anything of value directly or indirectly to a government official for the purpose (i) exerting improper influence or to obtain an improper benefit or business advantage, or (ii) inducing the official to conduct business with the business partner or Shipt.

Treatment of Confidential Information

When Shipt provides business partners with confidential information, they must preserve the confidentiality of such information and use it only for the purpose for which it was provided.

Business partners must comply with all applicable security and privacy laws and regulations as well as all applicable document retention requirements. Business partners must also maintain sufficient technical security and privacy controls to protect Shipt’s confidential information.

sustainability

Shipt recognizes the importance of environmental stewardship and we believe that doing our part embodies our value of Drive. Shipt expects our business partners to make concerted efforts to minimize the negative impact of its operations on the environment. At a minimum business partners must follow all applicable environmental laws and regulations were located or operating.

human rights and labor

Human Rights

We condemn forced labor and human trafficking and will not knowingly work with business partners who engage in these practices or the use of incarcerated labor. Business partners and their suppliers must, at a minimum, comply with all applicable labor laws and regulations where they operate and conduct business. We expect that the entities with which we do business similarly respect individual human rights and conduct their business operations free from human rights abuses, such as child or forced/compulsory labor, slavery, and human trafficking.

Health and Safety

At a minimum, Business partners must provide and maintain a work environment which meets all applicable occupational health and safety laws and regulations in place where they operate and conduct business. We expect hazards to be assessed and appropriate safeguards to be implemented, monitored, and workers be appropriately trained to prevent accidents, injuries, and illnesses.

Grievance Mechanism

Business partners are expected to implement effective grievance mechanisms to systematically receive, investigate, and respond to issues raised and implement remedies to resolve them. The United Nations Guiding Principles on Business and Human Rights (UNGPs) defines an effective grievance mechanism as legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on engagement and dialogue, and used as a source of continuous learning.

No Harassment or Discrimination

We respect cultural and individual differences and believe discrimination and harassment should not be tolerated. Business partners are expected to maintain a workplace free from discrimination and harassment. Business partners must comply with all applicable federal, state, and local anti-discrimination laws and laws prohibiting harassment.

Working Hours

Business partners must limit working hours to not exceed the legal requirements in places where they operate and conduct business. Shipt expects business partners to always maintain a safe working environment which affords the business partners' workers appropriate break time during working hours and adequate downtime between working hours.

Wages

Business partners must provide wages and benefits that meet or exceed the legal requirements in places where they operate and conduct business and which are paid in a timely manner. Shipt encourages business partners to provide all business partners' workers a living wage and to commit to the improvement of, and investment in, the lives of its employees.

Freedom of Association

We seek business partners who productively engage workers and value them as critical assets to sustainable business success. This includes respecting the rights of workers to make an informed decision as to whether to associate or not with any group, consistent with all applicable laws.

Shipt's commitment to equity and inclusion

Equity and inclusion are at the heart of what we do at Shipt. We expect our vendors to cultivate diverse teams with diverse experiences that's reflective of the communities we serve, because only then will we be able to build and deliver experiences that matter most to all those we serve.

Business Partner Expectations

We expect our business partners to share and uphold our values of:

Inclusive Work Environment

Foster an environment where all dimensions of difference are valued and represented.

Create equitable opportunities and experiences in recruitment, hiring, pay, development, retention, and advancement.

Equitable Representation

Strive to build diverse representation at every level of the workforce. Staff Shipt projects/accounts with diverse talent to reflect the communities we serve.

Improving Together Over Time

We recognize that everyone comes to this journey at a different starting point. Over time, we expect our business partners to make progress on efforts that drive action and accountability, including:

Policies and Reporting

Maintain policies that promote diversity and inclusion by preventing harassment, discrimination, and retaliation

Maintain an anonymous process for reporting harassment, discrimination, and retaliation

Training

Provide recurring harassment, discrimination, retaliation, and inclusion acumen training to all employees

* In accordance with local law



conflicts of interest.

Shipt has strict requirements when it comes to engaging in any activity that could create an actual or a perceived conflict of interest. A conflict of interest may arise when business decisions are influenced by, or could appear to be influenced by relationships or activities that create bias for a specific business partner. Team Members are required to prioritize Shipt's business interests, and make fair and unbiased business decisions.

Business partners are prohibited from offering, promising, or providing anything of value to a Shipt Team Member, a Team Member's family member, or to any third party representing Shipt which could influence, or appear to influence business decisions or secure a business advantage. For purposes of this Code, "anything of value" includes, but is not limited to, gifts / gift cards, meals, entertainment, transportation, travel, accommodations, expenses, cash, or donations on behalf of Shipt or a Team Member. Shipt Team Members and third party representatives, including auditors, are also prohibited from requesting anything of value from Shipt business partners. Business partners must contact Ethics@shipt.com immediately if a Shipt Team Member or anyone working on behalf of Shipt makes an improper request.

Business transactions involving former Shipt Team Members must be based upon Shipt's best interests. Shipt limits Team Member business dealings with former Shipt Team Members for a period of two years, to mitigate perceptions that certain business partners are favored due to prior employment relationships. Shipt Team Members are prohibited from proposing, negotiating or entering into any transaction on behalf of Shipt with a former Team Member for a period of two years following the former Team Member's last date of employment with Shipt, unless there has been pre-approval from the Ethics office.



confidentiality, security & privacy.

We know that our business partners can be even better partners when we share the right information. When Shipt provides business partners with confidential information, they must preserve the confidentiality of such information and use it only for the purpose for which it was provided.

Business partners must comply with all applicable security and privacy laws and regulations as well as all applicable document retention requirements. Business partners must also maintain sufficient technical security and privacy controls to protect Shipt's confidential information.

Shipt's confidential information includes, but is not limited to Shipt's business plans, retail pricing strategies, marketing plans, Partners Online content, team member personal information, customer and shopper/driver personal information and intellectual property. Business partners may not outsource, disclose, share, use, sell, delete, or retain this information outside the requirements defined in their contracts or non-disclosure agreements with Shipt. Unauthorized disclosures could harm Shipt, breach the contract, and possibly be illegal.

reporting violations.

Simply put, we require our business partners to follow all laws and the Business Partner Code of Conduct requirements. It is also your responsibility to promptly report any suspected violations by a Shipt Team Member, or an individual acting on behalf of Shipt, or one of our business partners. If you have questions or want to report an issue or concern, you have several resources and reporting options available.



Voice a concern, ask a question or report a violation



Email ethics@shipt.com



Visit ethicshotline.shipt.com



Call the Integrity Hotline - anonymous option, available 24 hrs a day
1-844-915-2921

Shipt does not tolerate retaliation of any kind against someone who reports a concern in good faith.

What happens when I share or report a concern?

- The Ethics team or the third party hotline creates a report of your concern
- Ethics will engage only the necessary partners to evaluate any reported matters
 - If your report is substantiated, Shipt will act promptly and appropriately
- While you may not know the final outcome due to confidentiality requirements, you can be sure that every concern reported with specific details is investigated thoroughly and promptly

Questions?

Contact: Ethics@shipt.com