

SpartanNash Company

Policy on Hedging and Pledging Company Stock

Background and Purpose

The Board of Directors of SpartanNash Company believes that ownership of the Company's stock by the Company's executive officers and members of the Board of Directors promotes alignment of the interests of the Company's shareholders with those of its leadership. The Board recognizes that transactions that are designed to hedge or offset declines in the market value of the Company's stock can disrupt this alignment, interfere with the Company's compensation programs and philosophies, and undermine policies regarding stock ownership.

The Board of Directors also recognizes that officer and director pledging of the Company's stock as collateral for indebtedness can be adverse to the interests of the Company's shareholders because it creates the risk of forced sales that depress the value of the Company's stock, create risk of legal violations, and may encourage excessive risk-taking by executives.

Scope

This policy applies to transactions in the Company's common stock and other equity securities by members of the Board of Directors and officers of the Company designated by the Board of Directors as "executive officers" for the purposes of federal securities laws.

Prohibition on Hedging and Pledging

Executive officers and directors of SpartanNash shall not, directly or indirectly:

- Purchase any financial instrument or enter into any transaction that is designed to hedge or offset any decrease in the market value of the Company's common stock or other equity securities (including, but not limited to, prepaid variable forward contracts, equity swaps, collars, or exchange funds); or
- Pledge, hypothecate, or otherwise encumber shares of the Company's common stock or other equity securities as collateral for indebtedness. This prohibition includes, but is not limited to, holding such shares in a margin account.

Compliance

Each executive officer and director of the Company will be expected to certify compliance with this policy in connection with the Company's annual securities questionnaires, and otherwise from time to time upon request by the Board of Directors. Executive officers and directors shall be afforded a reasonable opportunity to unwind or otherwise terminate any transaction existing

Adopted February 27, 2013

As amended through

November 19, 2013

as of the time such officer or director became subject to this policy that would otherwise violate this policy.