



SpartanNash Human Rights Policy November 2021

At SpartanNash, we are fueled by our passion to provide our customers, coworkers and communities with the best quality products, services and shopping experiences possible. Yet our drive takes us so much further than the aisles of the local grocery store or U.S. military commissary and exchange. With a nine-state retail footprint, 50-state wholesale distribution network and global military distribution channel, we recognize we have the ability to influence millions of store guests, independent retail customers, suppliers, vendors, shareholders and community partners.

In accordance with the United Nations (UN) Guiding Principles on Business and Human Rights, SpartanNash developed this policy guided by the content of the Universal Declaration of Human Rights. It applies to SpartanNash, our divisions, retail stores and warehouse operations, and other areas in which we have direct influence. We expect the same high standards and commitment of our suppliers, contractors and others with whom SpartanNash does business. SpartanNash's senior leaders oversee this policy and are responsible for managing the implementation and monitoring of our enterprise Environmental, Social and Governance (ESG) Impact Strategy.

Society and Stakeholder Engagement

SpartanNash puts **People First**. We support our Associates in feeling heard, respected and valued through transparent communications and the Total Rewards we provide. Furthermore, we are committed to creating a lasting, positive impact on the communities we serve. We support these communities through a wide range of programs such as Direct Your Dollars, corporate donations to community and non-profit organizations, grants from the SpartanNash Foundation, volunteering by our Associates, and affordable healthcare through our pharmacies and telemedicine services.

We work with community stakeholders to address our shared goals. We coordinate with national, regional and local stakeholders to implement this policy across our operational footprint and look to their guidance, support and collaboration in assessing and improving its effectiveness in meeting our stated goals.

Diversity, Equity, and Inclusion

At SpartanNash, we celebrate diversity and believe employing a diverse workforce is key to our success. We are committed to providing equal employment opportunities to all individuals regardless of personal characteristics, including but not limited to: race, gender, religion, disability, age, protected veteran status, or any legally recognized status entitled to protection under applicable federal, state or local laws. We have a policy that we conduct ourselves with dignity and respect each other, and the company does not tolerate discrimination or harassment. We take action to address and correct disrespectful, inappropriate behavior, unfair treatment, or retaliation of any kind in the workplace or in any work-related circumstance outside the workplace. SpartanNash is focused on ensuring that the rights of women and minority groups are protected and expects all SpartanNash Associates to reinforce our **People First**

culture to build a diverse and inclusive workplace. As a commitment to this, all Associates are required to complete training on Dignity and Respect, Anti-Harassment and Anti-Discrimination. SpartanNash also provides interactive workshops and ongoing training for people leaders, including Bridging the Diversity Gap and Your Role in Workplace Diversity training. To provide Associates support and connection within our organization, we have Associate Resource Groups available for young professionals, multicultural Associates, veterans and women.

SpartanNash believes that diversity, equity and inclusion drive value for our Associates, shareholders and customers. We lead with inclusion and strive to create an environment where Associates are valued and empowered to support our business objectives, customers and the communities we serve.

Safe, Healthy and Secure Workplace

Our people are our greatest asset. Our policies and programs provide a safe and healthy workplace in accordance with all local laws and regulations, in partnership with training to support SpartanNash's health and safety strategy. Everyone working at SpartanNash is a role model, and we all work together to achieve excellence in everything we do without harm to people, the environment or our communities. Throughout 2020, we implemented a new safety program called, "Do Your Part – Be Safety Smart." The program includes targeted safety goals; the appointment of a safety specialist at all company locations; instituting a safety focus in all team meetings; weekly safety calls with the CEO; development of Safety Leadership, Emergency Response, Ammonia Safety, and Safety Improvement Teams; along with monthly safety reviews by SpartanNash leadership to develop solutions to safety issues and achieve safety goals. More on our Safety and Security policies can be found in our SpartanNash Code of Conduct.

Forced Labor, Child Labor and Human Trafficking

All forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking are prohibited at SpartanNash.

SpartanNash hires individuals under the age of 18 where local jurisdiction allows and within the confines of the local laws. We take the responsibility of managing a minor's first job in their career seriously and do what we can to protect that experience and set them up for success.

SpartanNash is proud to have been the first food distributor and retailer in Michigan to sign Migrant Legal Aid's Fair Food Pledge in 2016, affirming our commitment to fair labor practices for Michigan's more than 94,000 migrant and seasonal farmworkers and their families since then.

Access to Nutritious Food and Water

We believe access to nutritious food and water is a fundamental human right. Our commitment to our communities and our stakeholders is to use our capabilities, resources and scale to combat food-related challenges.



We also respect the human need for sustainable water supplies and safe drinking water. Our approach to water stewardship incorporates the implementation of water reduction programs at our facilities.

SpartanNash is also a partner with Fair Food Network, providing the Double Up Food Bucks program at 43 SpartanNash corporate-owned stores throughout Michigan. The Double Up Food Bucks program enables Supplemental Nutrition Assistance Program (SNAP) participants to earn free produce when they buy fresh fruits and vegetables with their SNAP benefit at participating retailers.

Associate Engagement and Training

We believe that Associate engagement and education are key to the full implementation of this policy across our footprint. We provide role-specific training on human rights and how to recognize, mitigate and act on violations that reinforce our collective commitment to this policy.

Raising A Concern

Associates with concerns or questions related to SpartanNash's Human Rights Policy should contact their local HR leader or use the options below, which include an anonymous reporting tool:

- Call (toll free): 800-710-4848
- Website: spartannashcompany.ethicspoint.com

Public Reporting

We will report on our efforts and progress in implementing SpartanNash's Human Rights Policy in our CR Progress Report. The principles laid out in this policy are guiding our reporting framework and aligned with the UN Compact of Human Rights and UN Guiding Principles Reporting Framework.