

Human Rights Policy

Executive Summary

At SpartanNash (Company), we are fueled by our passion to provide our Associates, customers, store guests, 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 national retail footprint and a global wholesale distribution network, we recognize that we can influence millions of independent retail customers and their store guests, 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 Universal Declaration of Human Rights. The Policy applies to the SpartanNash corporate offices, retail stores and wholesale operations. We expect the same high standards and commitment to protecting human rights of our suppliers, contractors, and others with whom SpartanNash does business. The SpartanNash Executive Leadership Team (ELT) oversees this Policy and is responsible for managing the implementation and governance of our enterprise Environmental, Social and Governance (ESG) impact strategy.

We value differences and attract, develop, and retain talent from all backgrounds, experiences, and abilities. We actively strive for inclusive behaviors across our Company, encouraging a sense of belonging. We are committed to providing equal employment opportunities to all individuals regardless of personal characteristics, including but not limited to race, gender, ethnicity, religion, disability, age, protected veteran status, or any legally recognized status entitled to protection under applicable federal, state, or local laws. We have a Code of Conduct that guides us to conduct ourselves with dignity, respect each other, and 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.

As a commitment to this, all Associates are required to complete training on Dignity and Respect, Anti-Harassment, and Anti-Discrimination.

Society and Stakeholder Engagement

SpartanNash puts **People First**, and we strive to ensure that our Associates feel heard, respected, and valued. We demonstrate this in all aspects of our Associates' career experience through transparent communications and competitive benefits and compensation programs. Furthermore, we are committed to creating a lasting and positive impact in the communities we serve. We support these communities through a wide range of activities, including corporate donations to community and non-profit organizations, grants from the SpartanNash Foundation, volunteering by our Associates, and affordable healthcare through our pharmacies.

Diversity, Equity, Inclusion, and Belonging (DEIB)

SpartanNash expects all SpartanNash Associates to reinforce our **People First** culture to build a diverse and inclusive workplace.

We train our leaders and expect them to live our values and support DEIB. To provide Associates support and connection within our organization, we have Associate Resource Groups – Associate-led groups centered around common interests, backgrounds, or experiences – available for multi-cultural Associates, Veterans, women, and young professionals. SpartanNash believes that DEIB drives value for our



Associates, shareholders, and customers. We lead with inclusion and strive to create an environment where Associates feel they belong and can do their best work.

Safe and Healthy Workplace

SpartanNash is fully committed to provide a safe and healthy workplace for our Associates in accordance with all laws and regulations. Consistent with our **People First** priority, the Company's ELT established a goal to be an industry safety leader in all areas of our business. We have in place a comprehensive Risk & Safety Systems Manual that identifies practices and procedures we follow to minimize the possibility of safety incidents that could harm Associates, customers, store guests and our communities. All divisions and facilities owned or operated by the Company are expected to conduct business operations in a manner consistent with the specific objectives and through application of the guidelines published in the SpartanNash [Environmental, Health & Safety Commitment and Policy](#).

Forced Labor, Child Labor, and Human Trafficking

All forms of forced labor, including without limitation prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking are strictly prohibited at SpartanNash.

SpartanNash hires individuals under the age of 18 where local jurisdiction allows and within the confines of the applicable state and 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 the Migrant Legal Aid 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 provide affordable access to food and water and 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 over 40 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.

Raising A Concern

Associates with concerns or questions related to SpartanNash's Human Rights Policy are encouraged to speak with their leader or local Human Resources representative. For confidential or anonymous reporting of illegal or unethical conduct, Associates may call SpartanNash's Ethics Line, which is available 24 hours a day, seven days a week:

Call (toll free): 800-710-4848

Website: spartannashcompany.ethicspoint.com

Public Reporting

We will report on our efforts and progress in implementing the SpartanNash Human Rights Policy in our [Environment, Social and Governance \(ESG\) 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.

Version History

Effective:	Nov. 2021	Updated:	April 2024
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