

# PetSmart Supplier Code of Conduct

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As the largest pet specialty retailer of services and solutions for the lifetime needs of pets, PetSmart is committed to the highest standard of ethical conduct and business integrity. In each business transaction we make, we strive to improve the products and services we provide, make responsible decisions in how we manage our business, and create a positive impact for our customers, our associates, and the communities where we live and work. We strive to drive excellence in our own business decisions and to support and positively influence ethics and integrity in our supply chain.

This PetSmart Supplier Code of Conduct (“Code”) applies to PetSmart’s vendors/suppliers and their subsidiaries, affiliates, and subcontractors (each a “Supplier”) who provide goods or services to PetSmart or its affiliates and subsidiaries, whether directly or indirectly. PetSmart requires its Suppliers to act in accordance with this Code and in full compliance with all applicable laws and regulations. Suppliers are responsible for ensuring that they and their employees, workers, representatives, agents and subcontractors comply with this Code.

PetSmart has the right at any time to audit its Supplier’s compliance with this Code, and any potential or actual violations may jeopardize the Supplier’s business relationship with PetSmart, up to and including termination.

## Responsibilities of PetSmart Suppliers

PetSmart expects its Suppliers to act ethically and with integrity in all business dealings and requires that each Supplier—at a minimum—adhere to the following standards:

### Labor and Human Rights

PetSmart believes that all the workers within our supply chain deserve a fair and ethical workplace. PetSmart expects Suppliers to treat their workers with dignity and respect and to uphold the highest standard of human rights.

PetSmart specifically requires the following of each of its Suppliers:

**Prevention of Underage Labor.** Suppliers will employ workers who are at least 15 years of age or the applicable required minimum age in the relevant jurisdiction, whichever is higher. In this connection, Suppliers will maintain objective procedures for accurately verifying the age of workers and job applicants.

**Juvenile Workers Protections.** Suppliers will adhere to the principles set out in the ILO Minimum Age Convention No. 138 if it employs workers older than the applicable legal minimum age but younger than 18, including preventing such workers from performing work that might jeopardize their health, safety, or morals.

**Voluntary Labor.** All labor must be voluntary. Suppliers will not use forced, bonded (including debt bondage), indentured, or prison labor. Suppliers will not engage or support slavery or human trafficking and will comply with all applicable laws on human trafficking and slavery. Workers must be allowed to maintain control over their identity documents and Suppliers shall ensure that no recruitment or other fees are required to

be paid by workers. Workers shall have the right to freedom of movement without excess restrictions on entering and exiting facilities and workers must be able to voluntarily end their employment without restrictions e.g. excessive notice periods or fines for termination of their contract.

**Working Hours.** Suppliers will comply with all applicable laws with respect to working hours and days of rest and in any event shall ensure that working hours do not exceed 60 hours per week, whether or not allowed by local law, except in emergency or other exceptional circumstances. Suppliers must also ensure that workers are allowed at least one day off in every seven-day working period. All overtime must be voluntary and all working hours are required to be documented and monitored accurately.

**Compensation.** Suppliers' workers should be paid a fair wage commensurate with prevailing industry standards. Workers' wages, overtime and benefits should meet or exceed legal standards or collective agreements, whichever are higher.

**Freedom of Associations.** Suppliers must respect the right of its workers to freely choose whether or not to join associations, organizations and trade unions, and to bargain collectively, as provided by local law or regulation.

**Health and Safety.** Suppliers must provide its workers a workplace that meets applicable health and safety standards and supports accident prevention for all personnel. Suppliers must identify and manage occupational health and safety hazards through a combination of hazard elimination and engineering and administrative controls.

**Antidiscrimination.** Suppliers will promote a workplace that is free of discrimination and will not discriminate against any worker based on age, disability, ethnic origin, national origin, gender, marital status, physical appearance, pregnancy, race, religion, sexual orientation, or union association, in hiring and other employment practices.

**Anti-harassment.** Suppliers will promote a workplace that is free of harassment and will not threaten workers or subject them to harsh or inhumane treatment, including verbal abuse, psychological harassment or sexual harassment.

#### Business Practices

PetSmart is committed to ethical conduct and integrity in all of its business dealings. PetSmart expects Suppliers to be ethical in every aspect of its business, including its sourcing, relationships, operations and practices.

PetSmart specifically requires the following of each of its Suppliers:

**Conflicts of Interest.** Suppliers must not enter into transactions with PetSmart, PetSmart employees, or PetSmart employees' close family members that would create a conflict of interest.

**Gifts and Entertainment.** Suppliers will not offer gifts or entertainment to PetSmart employees or their representatives.

**Anti-corruption.** Suppliers will comply with all anti-corruption laws and regulations in the country where it operates in addition to the United States Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions. Suppliers will not offer bribes, kickbacks, illegal political contributions or other improper payments to any customer, government official or third party, and will not offer or accept anything of value to or from government officials or its business partners that would influence someone's ability to make objective business decisions.

**Competing Fairly.** Suppliers will comply with all antitrust and competition laws and regulations. Suppliers will not engage in agreements, whether oral or written, with its business partners that would restrain trade and will not discuss or suggest actions to PetSmart or any third party that would restrain trade (e.g., actions regarding fixing prices, terms and conditions of sale, costs, profit margins, or other aspects of the competition for sales to third parties).

**Global Trade and Compliance.** Suppliers will comply with all applicable import/export laws in its dealing with PetSmart and will comply with applicable international trade control and customs laws and regulations, including those relating to licensing, shipping and import documentation and reporting, and record retention requirements. Suppliers will also make reasonable efforts to have a security program that is in accordance with the United States Customs-Trade Partnership Against Terrorism's (C-TPAT) minimum security requirements. Additionally, Suppliers will not act, directly or indirectly, for or on behalf of any individual or entity that: (i) appears on the Specially Designated Nationals and Blocked Person List, as maintained by the Office of Foreign Assets Control (OFAC) of the US Department of the Treasury, or (ii) is otherwise subject to OFAC sanctions.

**Boycotts.** Suppliers will not request PetSmart to participate in any type of boycott and will not request or require PetSmart to refuse to do business with other people or countries, through contracts, invoices, e-mails, shipping documentation, or any other form.

**Environmental Responsibility.** Suppliers will maintain environmentally responsible and sustainable business practices and comply with all laws and regulations in the country where it operates. Suppliers should only use lawfully made chemicals and supplies in its goods (if applicable) and should avoid or minimize its use of regulated materials, and only use such materials appropriately.

**Product Quality and Compliance.** Suppliers, and factories producing products for PetSmart on behalf of Suppliers, agree to comply with PetSmart's Product Quality and Compliance manual which includes meeting applicable regulations, product testing and manufacturing consistent with current good manufacturing practices (cGMP).

**Responsible Sub-contracting.** Suppliers will obtain pre-approval from PetSmart prior to engaging in sub-contracting. Suppliers will adhere to PetSmart's Subcontracting Disclosure Policy and avoid engaging in unauthorized sub-contracting, including homeworking.

**Animal Welfare.** Suppliers will engage in practices that promote the humane treatment of animals. To the extent applicable, this includes providing an environment that is free from distress, cruelty, abuse, and neglect and that is consistent with all applicable laws.

**Confidential Information and Data Security.** Suppliers will not improperly use or disclose any confidential information, including trade secrets, of PetSmart or of any third party. Suppliers will use PetSmart confidential information only for the purpose for which it is provided. Suppliers will implement and maintain physical, technical and organizational measures and safeguards across its computer systems, portable electronic devices, laptops, and other storage devices that protect the security and confidentiality of any PetSmart data and information that it stores, accesses or processes. Suppliers will encrypt any PetSmart data that it sends over the Internet using a secure transfer method (e.g., SFTP). Suppliers shall notify PetSmart immediately in the event a data security breach occurs.

**Publicity.** Without express approval, Suppliers will not use the name “PetSmart” or any other name, mark, logo, design, product designations or other intellectual property of PetSmart or any of its related, affiliated or subsidiary companies in any advertising, publicity or promotion or to express or to imply any endorsement by PetSmart of a Supplier’s products, services or business.

The foregoing standards are subject to modification at the discretion of PetSmart.

### How to Raise an Ethics or Integrity Concern

Each PetSmart Supplier is responsible to promptly inform PetSmart of any ethics or integrity concern involving or affecting PetSmart as soon as the Supplier has knowledge of such concern. A PetSmart Supplier will also provide reasonable assistance as requested by PetSmart to assist in the investigation of any concern involving PetSmart or Supplier.

If you have an ethics or integrity concern, or questions in general about this policy, you must take one or more of the following actions:

- Raise the concern in writing with your PetSmart business contact
- Call the CareSmart Hotline at 1-800-738-4693 in the United States, 800-96-0217 from mainland China or 4009914422 from Hong Kong
- Submit a report to the CareSmart web portal at [CareSmart.ethicspoint.com](http://CareSmart.ethicspoint.com)
- Send an email to [ethicsandintegrity@petsmart.com](mailto:ethicsandintegrity@petsmart.com)

The hotline and web portal are operated by a third-party provider and are available to us 24 hours a day, 7 days a week. PetSmart forbids retaliation against any person reporting an ethics or integrity concern in good faith.

### PetSmart’s Code of Ethics & Integrity

PetSmart’s *Code of Ethics & Integrity*, which may be found at <https://www.petsmartcorporate.com/ethics-and-integrity>, sets forth PetSmart’s commitment to ethical conduct and integrity. The standards set forth in PetSmart’s Code of Ethics & Integrity govern the conduct of all PetSmart employees and are supplemented by compliance policies and procedures adopted by PetSmart. PetSmart expects its Suppliers to maintain their own code of conduct that is at least as stringent as PetSmart’s *Code of Ethics & Integrity*