



## **Confidentiality of Business Information Policy**

From time to time, team members may be exposed to Sprouts' Confidential Information. "Confidential Information" is defined as all non-public information that might be useful to competitors or harmful to Sprouts if disclosed and includes but is not limited to:

- Technical data
- Company financial information (e.g., sales, sales plans, key performance indicators, profits, inventory levels)
- Real Estate plans (e.g., relocations, new store openings)
- Merchandise planning materials (e.g., promotion schedules, inventory levels)
- Pricing
- Sales audit and e-commerce data
- Marketing plans and strategies
- Customer addresses, credit card numbers, and social security numbers
- Certain employee-related information (e.g., personal health information, SSNs, budgeted payroll or expenses)
- Human Resources and Retail Operations training materials
- Information pertaining to anyone with whom Sprouts does business (e.g., suppliers, landlords)

Apply all necessary safeguards to protect Confidential Information, such as marking it "Confidential" and keeping it in a secure area or locked drawer when not in use. If you leave Sprouts, all Confidential Information (e.g., manuals, documents, software, etc.), and copies thereof, must be returned. The unauthorized use, disclosure, or destruction of Confidential Information is prohibited, and may result in disciplinary action, up to and including termination, criminal prosecution and/or other legal action.

This policy does not prohibit discussions by team members regarding wages, hours, discipline, or working conditions on company property or company time. Sprouts will not take any adverse employment action against a team member for disclosing his or her own wages or discussing another team member's wages that have been disclosed voluntarily. However, certain team members entrusted with other team members' pay and compensation information by the nature of their job (i.e., Store Managers, Administrative Coordinators, and Human Resources) should not disclose or discuss such information to other co-workers.

Contact your supervisor, manager or the Human Resources department with questions as to whether certain information is confidential, or to report a violation of this policy.