



GUIDELINES FOR RESPONDING TO SOLICITORS

Sprouts' Non-Solicitation Policy prohibits solicitation, petitioning, or distribution of literature (i.e., handbills) by all third parties on Company premises with no exceptions. This includes unions, clubs, charities, churches, religious organizations, and merchants. By way of example, this includes Salvation Army bell ringers, Greenpeace, and even Girl Scout cookie sales. These guidelines are designed to provide you with assistance in responding to solicitation attempts at the store and should be reviewed regularly.

Non-Union Solicitation

You should take the following steps if confronted with a solicitor, handbiller, or picketer ("Solicitors"):

1. If blocking access to the store, politely approach the Solicitors and ask them to respect our non-solicitation policy by ceasing their activities and leaving.
2. If they still won't leave, request that they not block ingress/egress to the store and remain at least 50 ft. from store entrance (e.g., towards the parking lot or sidewalk).
3. If they won't comply with our request to remain 50 ft. from entrance, immediately contact our Lease Administration team (list-leaseadministration@sprouts.com or 602-682-1516) for help coordinating with landlord/property manager to remove Solicitors.
 - If the store is in a shopping center that has a designated area for Solicitors, we can direct them there (please discuss with Lease Administration to determine whether there is a designated location at your store).
4. Immediately contact law enforcement and Store Support personnel above if Solicitors:
 - Are in the store soliciting and won't leave as requested (but not if they are just shopping).
 - Store management will make the call on whether to press trespass charges against Solicitors.
 - Are loud, aggressive, or have touched a Team Member (TM) or customer or used profanity or other obscene gestures.
 - Are interfering with access to the store, are creating a disturbance, or otherwise distracting customers.
5. In every case, TMs should merely observe until law enforcement or security arrives (do not engage in an argument or confront the Solicitors). You may use your phones or other video device to record any illegal activity (violence, harassment, blocking ingress and egress, but should NOT record any peaceful picketing activity). You should document the activities of the solicitors with a written, signed, dated report made immediately after the incident. If any other store managers witness the incident, take their statements as well. Once you have completed any witness statements, send them to list-dept-bps-lossprevention@sprouts.com.

Union Solicitation

1. Non-California Store: Follow the 5 Steps above.
2. California Stores only: Peaceful picketing/handbilling by unions, even on private sidewalks, is protected by California law. However, if union solicitors are being aggressive, blocking ingress and egress of the store, or harassing and intimidating customers or TMs, **follow point 4 and 5 above** (i.e., contact law enforcement and Store Support personnel immediately).

3. Notify your Regional Director as well as Legal (Legal@Sprouts.com) and Human Resources ([480-385-2300, opt. 2](tel:480-385-2300)) noting the following (i) store # and on-duty SM, (ii) date and time of arrival and departure, (iii) number and affiliation of union reps, (iv) copy of materials being passed out and pictures of signs and picketers (if any), (v) their location at the premises, and (vi) whether any customers or TMs have complained. Sprouts will analyze the information to determine if we can seek legal action to stop the activity.

In some cases, we will pursue legal action to stop the Solicitors. Unfortunately, this is not a quick process, and may not result in immediate removal of the unwanted disturbance.

Your Response to Questions by Customers or TMs

Non-California Stores: If asked why Sprouts prohibits solicitation or handbilling, you should explain that the purpose of the policy is to provide a safe and secure environment for our TMs and customers, and a distraction-free shopping experience. To meet these goals, we prohibit all solicitation on Sprouts property; this is not about a specific organization and its goals.

California Stores: If asked why Sprouts allows *union* picketing or handbilling, you should explain that California law provides that unions have the right to peacefully picket at retail stores to inform the public about a labor dispute, even if it takes place on private property. *However*, intimidation, harassment, and impeding ingress and egress from the store is not peaceful picketing, and, if that occurs, Sprouts will alert law enforcement, its Legal Department, and pursue appropriate legal action to stop such activity.

Who to Contact with Questions or Concerns

If you are contacted by the press/media, please contact our communications team at media@sprouts.com.

If you are contacted by a union, an attorney, or any Govt. Agency, please contact: Legal@Sprouts.com or 480-814-8016 x1395.

General questions please contact Human Resources: 480.385.2300, opt. 2.