



Non-Discrimination & Harassment Policy

Sprouts is committed to providing a work environment free of discrimination and harassment based on actual or perceived race, religion, color, creed, national origin, ancestry, ethnicity, age, sex, pregnancy, childbirth, breast feeding and medical conditions related to pregnancy, childbirth and breast feeding, familial status, sexual orientation, gender identity or expression, genetic information, mental and physical disability, medical condition, leave of absence status, military and veteran's status, marital status, citizenship or immigration status, status as a victim of domestic violence or sexual assault or stalking, unemployment status, or any other basis prohibited by applicable law. For purposes of this policy, "race" includes traits historically associated with race, including but not limited to hair texture and protective hairstyles. "Protective hairstyles" include, but are not limited to, hairstyles such as braids, locks, and twists. Accordingly, Sprouts prohibits, and will not tolerate, discrimination or harassment based on *any* actual or perceived protected characteristic by or against any supervisor, leader, coworker, and/or any other third-party or visitor that comes into contact with a Sprouts team member (including, without limitation, any customer, contractor, temporary team member, vendor, or applicant). Sprouts also prohibits, and will not tolerate, retaliation.

Definitions of Harassment & Discrimination

Harassment is defined as engaging conduct that is unwelcome and that is based on any protected category. Workplace harassment involves unwelcome words or actions that are known or should be known to be offensive, embarrassing, humiliating, abusive, or demeaning. Discrimination means unequal treatment of persons based on any protected category. Harassment or discrimination of any type by any supervisor, manager, coworker, and/or any other third party or visitor is not tolerated at Sprouts and will be aggressively investigated.

Sexual Harassment

Sexual harassment means unwanted sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature where submission or rejection of the conduct leads to tangible employment action or the unwanted behavior: (a) unreasonable interferes with a team member's work performance; or (b) creates an intimidating, hostile, or offensive work environment. Sexual harassment includes, without limitation, conduct such as:

- Unwanted sexual advances;
- Offering employment or other benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, videos, cartoons, or posters;
- Verbal conduct, such as making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about a team member's body or dress;
- "Sexting" (sending text messages, pictures, or videos of a sexual nature using an electronic medium);
- "Sexist" comments or behavior (conduct that demeans other individuals because of their sex, even if not vulgar, lewd, or sexually provocative);
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes or invitations; or
- Physical conduct, such as unwelcome touching, assault, or impeding or blocking movements.



Sexual harassment – whether directed at a member of the same sex or gender or a member of a different sex or gender - is unlawful and is prohibited by this policy. Conduct not motivated by sexual desire may still be considered sexual harassment under this policy. This policy applies in any work-related setting, whether on Company premises, business related events or travel, as well as non-physical work-related settings, such as via phone, email, instant messaging, text messaging, or any other electronic medium.

Other Types of Harassment

Prohibited harassment on the basis of any protected category includes unwelcome behaviors or actions that unreasonably interfere with work performance or create a hostile environment. Examples of unwelcome behaviors or actions include, but are not limited to:

- Comments containing threats, epithets, derogatory comments or slurs (including “comments” made through electronic means, i.e., computer, mobile device, text, e-mail, or social media).
- Visual conduct, including derogatory, antagonizing, or ridiculing posters, photographs, videos, cartoons, drawings, or gestures.
- Physical conduct, including assault, unwanted touching or blocking normal movement.
- Retaliation for making harassment reports or threatening to report harassment.

Abusive Conduct & Bullying

“Abusive conduct” is conduct of an employer or employee in the workplace, with malice, that a reasonable person would find hostile, offensive, and unrelated to the employer’s legitimate business interests. Abusive conduct may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person’s work performance. A single act does not constitute abusive conduct unless especially severe and outrageous.

“Bullying” means persistent, offensive, abusive, intimidating or insulting behavior or unfair actions directed at another individual, causing the recipient to feel threatened, abused, humiliated, or vulnerable.

Reasonable action taken by a supervisor related to management or direction of team members (e.g., managing performance, assigning work, or reasonable disciplinary actions), expressing differences of opinion, or offering constructive feedback or guidance about work-related behavior generally do not constitute abusive conduct or bullying.

Both abusive conduct and bullying can take place through electronic means (i.e, computer, mobile device, text, e-mail, or social media).

While not necessarily unlawful, abusive conduct and bullying is not tolerated and violates Sprouts’ policy. Instances of potential abusive conduct and bullying will be investigated consistent with the “Investigations” section below.

Responsibilities

In addition to complying with this policy, all team members who experience or observe actual or suspected violations of this policy have the responsibility to report it, as explained in the Reporting Concerns section, above. Team members must also ensure that they read, understand, and comply at all times with this policy.



Reporting Concerns

Sprouts managers and supervisors must promptly report all alleged violations of this policy (whether received formally or informally) to an appropriate Company representative (e.g., the Human Resources department). Managers and supervisors must also ensure compliance with all training requirements in this policy. Even if the team member or you believe the situation will resolve itself, or if the team member does not want to report it, Sprouts has an obligation to investigate.

All team members play a part in ensuring the workplace is free from harassment, discrimination, and retaliation. You should report if:

- You feel you're being harassed, discriminated against, retaliated against; or
- You learn of or observe possible discrimination, harassment, or retaliation

To report, immediately use one of the options listed below:

- Ask the harasser to stop if you are comfortable doing so; or
- Report the situation to a manager or supervisor; or
- Call the HR Support Desk (also called "Service Now") at (480) 385-2300 - Option 2; or
- Use the HR Support Desk (Service Now) web portal, available at <https://sprouts.service-now.com/hr> or
- Report the situation to a member of the Human Resources Department; or
- Call the Ethics Hotline at 1-855-748-5773; or
- Use the Ethics Point web portal, available at www.sprouts.ethicspoint.com; or
California team members may contact the California Department of Fair Employment and Housing; Delaware team members may contact the Delaware Department of Labor Office of Anti-Discrimination, and all team members may contact the U.S. Equal Opportunity Commission (EEOC) or a similar state agency, The nearest office can be found by visiting the agency websites www.eeoc.gov and www.dfeh.ca.gov.

Failure to report such conduct could result in disciplinary action, up to and including termination.

Investigations

All complaints received will be:

- Treated confidentially, to the extent possible consistent with a thorough and impartial investigation;
- Responded to in a timely manner;
- Investigated promptly and thoroughly by qualified personnel; and
- Documented and tracked to ensure reasonable progress.

If Sprouts determines that this policy has been violated, appropriate and prompt corrective remedial action will be taken. Appropriate action will also be taken to deter any future harassment, discrimination, or retaliation. You will be apprised of outcome at the conclusion of the investigation.

Sprouts expects team members to cooperate in all aspects of investigations and not provide false information, refuse to be forthcoming during the investigation, retaliate against anyone who brings forward a complaint or participates in an investigation, or otherwise attempt to improperly or coercively influence the investigation.



Retaliation Prohibited

Retaliation means punishing a person for engaging in a legally protected activity. Retaliation can include any negative job action, such as demotion, discipline, termination, salary reduction, or job or shift reassignment. Sprouts prohibits retaliation against any team member who reports a violation of this policy or participates in the investigation of a potential policy violation. If you feel you're being retaliated against, please take one of the steps listed in "Reporting Concerns," above. Individuals who submit a report (either of conduct experienced or observed) and witnesses who provide information regarding reports will be protected from retaliation by co-workers, managers, and supervisors. Any team member who retaliates against an individual will be disciplined appropriately.