



Off-the-Clock Work Prohibition Policy

Sprouts is committed to complying with all applicable local, state and federal wage and hour laws. Non-exempt team members are required to record all work time – whether authorized or unauthorized, scheduled or unscheduled, overtime or straight time, benefit or non-productive hours (e.g. vacation, sick time). “Work time” includes any time spent directly performing a function of the job such as opening the store, participating in conference calls, making or receiving work-related phone calls, texts or emails, filing, completing paperwork, and preparing work schedules and must be reported.

“*Off-the-clock*” work is strictly prohibited. This covers a wide range of activities, both authorized and unauthorized. Examples include, but are not limited to, voluntarily working while clocked out during your meal period or before/after hours or providing customer service or starting/finishing a task before/after clocking out.

To avoid the potential for “off-the-clock” activity, non-exempt hourly team members are prohibited from:

- Inaccurately recording time worked;
- Opening the store or assisting customers, before clocking in;
- Closing the store or assisting customers, after clocking out;
- Attending meetings, training, participating in conference calls, filing or completing paperwork, preparing work schedules, making bank deposit runs, stocking or performing inventory, processing shipment, or working during a meal period while clocked out;
- Failing to record hours for work performed at home or while not in the store, including (i) time spent traveling to a work location separate from your home store, such as to another store, district meetings, training sessions, to purchase supplies, or to the bank; or (ii) work completed on a personal computer or personal mobile device;
- Allowing a co-worker to complete your time sheet;
- Intentional alternations or “corrections” to misrepresent hours worked;
- Transferring hours from one day to another on a time sheet;
- Keying in non-productive pay codes as a substitute for actual hours worked; or
- Allowing team members (or non-team members) to perform work at a store without compensation.

Failure to record hours of work, or compensate team members for all hours worked, is a violation of company policy, as well as state and federal law, and all responsible team members (including the team member and management) are subject to disciplinary action, up to and including termination.

Non-exempt team members also should not work by remote access via their personal computers or mobile devices while clocked out. For example, you are not required or expected to read, send, or respond to company e-mail or texts while clocked out. If this occurs, all time spent doing so should be recorded or added to your timesheet.

Management is responsible for ensuring non-exempt hourly team members do not work off-the-clock. Be particularly concerned with instances where team members have performed a level of work that would not ordinarily be completed within the scheduled hours or with time sheets having regularly repeating 8s. Any conduct encouraging or condoning the inaccurate recording of work time is strictly prohibited.

Supervisors or managers who learn a non-exempt hourly team member is working off-the-clock must immediately report it to their manager and the Human Resources department. Failure to do so will result in disciplinary action, up to and including termination. If a non-exempt hourly team member is discovered to be working off-the-clock, he or she must be immediately instructed to stop working, reminded of Company policy, and informed that continued work off-the-clock may lead to disciplinary action. Moreover, the supervisor or manager should work with the team member to adjust his or her time entries to ensure that the team member is compensated for all time worked.

If you have questions, or to report a suspected violation, contact your supervisor, manager, the Human Resource department, the Ethics Hotline (1-855-748-5773) or at www.sprouts.ethicspoint.com.