

Sprouts Farmers Markets

Solicitation Policy Operations Guide

Suggested Steps for Handling Solicitors at our stores:

1. Post the following policy at the store and on a portable sign that can be placed in front of the store if necessary (i.e. when solicitors are present or have been visiting frequently):

Third Party Solicitation Policy: Sprouts is a proud and committed member of each and every community it serves. Experience, however, has shown that the potential is too great for serious problems if the company's premises are used for anything other than providing a top-quality, value-oriented shopping experience. To ensure that we are able to provide this experience, Sprouts has implemented this Third Party Solicitation Policy at all of its stores throughout the country (all of which are located on private property). In order to provide a safe and secure environment for our Team Members, and a distraction-free shopping environment for our customers, Sprouts does not allow solicitation, petitioning or distribution of literature at our markets regardless of the cause being represented. This includes, but is not limited to, merchants, clubs, charities, political parties, labor unions and religious organizations.

All store personnel should be trained to spot violations of this policy and to report any issue to the manager on duty.

2. For solicitors that request permission, they should be given a copy of the policy and told that, unfortunately, Sprouts has had to take the position that all solicitation is precluded in order to avoid the occasional solicitor that may cause disruption or safety issues.
3. The store manager will want to have had a conversation with the landlord, mall management (if applicable) and local law enforcement in advance and determine their policy/practice on the issue of solicitors. We need all parties in agreement that the store is on private property and there is no impediment to our enforcing our non-solicitation policy. If a store is in a mall that allows solicitors – it should have an area designated for that purpose.
4. When a solicitor is found on the property, the manager on duty should be immediately consulted to ensure consistent enforcement of this policy.
 - a. If the solicitor is being loud, offensive, aggressive or has touched an employee or shopper, law enforcement should be contacted immediately and market personnel should merely observe.
 - b. If the solicitor is simply soliciting, the manager on duty or his/her designee should politely approach the person and ask that the solicitor respect our policy by ceasing their activities and leaving our property. If solicitors or petitioners wish to withdraw to a public sidewalk that does not interfere with access to the market, they have that option. Unfortunately, however, persons in violation of this policy often refuse to comply with a polite request.
 - c. If, in the estimation of the manager on duty, the solicitor is interfering with access to the store, is creating a disturbance, or otherwise creating a potential distraction for the shoppers, the manager on duty should advise the solicitor that property security (if applicable) or local law enforcement has been contacted. Store personnel should then have no interaction with the solicitor but noticeably observe the solicitor until security or

law enforcement arrive. The act of warning that security or law enforcement are coming – and conspicuously observing – is usually enough to dissuade most solicitors from remaining.

- i. If a store is located in a mall that is required to accommodate petitioning, we should make arrangements with mall management to designate an appropriate area for that activity other than any access point to our store. In some cases, solicitors and petitioners refuse to abide by rules established by the mall, and mall management may utilize their own security or local law enforcement.
5. Any contact by anyone claiming to be a lawyer for the solicitor or the press should be referred to the company's Legal Department.
6. Any questions regarding this policy should be referred to the company's Legal Department.