Purpose

Meijer has maintained high ethical standards since it was founded in 1934. These standards have become a vital part of our Company heritage and apply to all Meijer team members. Meijer believes that there are basic principles for good business practices and that these business practices produce good business results, as well as earn us an extremely valuable reputation for integrity with our team members, vendors, suppliers, and consumers.

Ethical behavior requires moving beyond strict honesty, to being honorable in everything we do and setting the best possible example. In carrying out job functions and making decisions related to job duties, Meijer team members must give priority to the Company's interests, even though they may conflict with personal interests, or the interest of family and friends, and must act in compliance with all federal, state, local laws, regulations and ordinances of each community in which we operate. Our Meijer Code of Ethics and Business Conduct reaffirms the standards and rules by which each of us must abide.

It is not possible to state a single rule that will accurately describe every situation in which an ethical conflict could arise. Full disclosure and transparency needs to be the guiding principle. In this policy statement some general rules are listed which define those personal interests or other circumstances. If you are unclear about a specific situation, it is your responsibility to contact your first assistant, a Human Resources representative, or the Chief Compliance Officer to seek clarification before proceeding.

While our Code of Ethics and Business Conduct guides us to achieve our goals and satisfy our customers, we fulfill the needs of our customers, team members and communities we serve by taking personal responsibility for each of our Core Values and Guiding Principles.

Core Values

Our Core Values capture who we are as a retailer. When you think Meijer, you and our communities think Customers, Competition, Family, Freshness, and Safety and Health. These Values are not new; instead, they are descriptions of who we
are, who we have always been, and what makes Meijer a home for higher standards and great prices.

- **Customers:** Fred Meijer always said, “Customers don’t need us, we need them.” At Meijer, we focus on our customers and thrive by meeting their needs, exceeding their expectations and offering a compelling combination of value and convenience.

- **Competition:** Retailing is a fast-paced business that demands continuous improvement. Meijer is committed to keeping our competitive spirit strong and staying nimble and flexible to win in the marketplace.

- **Family:** Meijer is a family business. We believe in treating each other with dignity and respect. We are committed to strengthening the communities we serve.

- **Freshness:** Meijer is known for freshness. A focus on fresh food, thinking, and innovation makes us better at serving our customers.

- **Safety and Health:** Meijer provides a safe and healthy environment for our team members. We create a safe shopping destination in the communities we serve and offer products and services to help our customers lead healthier lives.

**Scope**

This policy applies to all Meijer team members.

**Policy**

**Build Trust and Credibility**

The success of our business is dependent on the trust and confidence we earn from our team members, customers, and vendors. We gain credibility by adhering to our commitments, displaying honesty and integrity, and only reaching Company goals through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is critical to ask yourself:

- **Will this build trust and credibility for Meijer?**

- **Will it help create a working environment in which Meijer can succeed over the long term?**
Can I ethically follow through on the commitment I am making?

The only way we will maximize trust and credibility is by answering “Yes” to those questions and by working every day to build our trust and credibility.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Meijer is committed to creating such an environment because it brings out the full potential in each of us, and in turn contributes directly to our business success.

Meijer is an equal opportunity employer and is committed to providing a workplace that is free from discrimination of all types. Any team member who feels they are being harassed or discriminated against should report the incident to his or her first assistant, Human Resources, or call the Meijer Hotline at 1-888-691-0779. The following policies also address employment matters:

- **0053 Equal Employment Opportunity**
- **0070 Harassment**
- **0012 Providing Reasonable Accommodations to Persons with Disabilities**
- **0088 Religious Accommodation**
- **0136 Non-Retaliation**

Create a Culture of Open and Honest Communication

At Meijer everyone should feel comfortable to speak his or her mind, with respect to ethical issues and concerns. Company leadership has a responsibility to create an open and supportive environment where team members feel comfortable raising such issues and concerns. We all benefit tremendously when team members exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Meijer will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the Company will take appropriate action. We will not tolerate retaliation against team members who raise genuine ethical concerns in good faith. Please refer to **Policy 0136 Non-Retaliation** that governs the standards and expectations involving retaliation.
Team members are encouraged to address ethical issues and concerns with their first assistant or their Human Resources representative, as most problems can be resolved swiftly. If for any reason that is not possible or if a team member is not comfortable raising the issue with his or her first assistant, they may call the Meijer Hotline at 1-888-691-0779 or contact the Chief Compliance Officer.

Meijer’s Open Door Policy encourages communication, feedback, and discussion about any workplace questions, concerns, or issues. Policy 0068 Open Door Policy encourages team members to openly discuss work-related concerns to seek a resolution without fear of reprisal.

Set Tone at the Top
Leadership has the added responsibility for demonstrating, through their actions, the importance of the Code of Ethics and Business Conduct. In any business, ethical behavior does not simply happen, it is the product of clear and direct communication of behavioral expectations, modeled from the top, and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code of Ethics and Business Conduct work, leadership must be responsible for promptly addressing ethical questions or concerns raised by team members and for taking the appropriate steps to resolve such issues. Leadership should not consider team members’ ethical concerns as threats or challenges of their authority, but rather as another encouraged form of business communication. At Meijer, we want the ethics dialogue to become a natural part of daily work.

Uphold the Law
Our Company’s commitment to integrity begins with making sure each of us individually and the Company as a whole complies with all laws, rules, and regulations where we do business. Further, each of us must have an awareness and understanding of Company policies, laws, rules, and regulations that apply to our specific roles. In carrying out our roles and responsibilities for Meijer, if we are unsure of whether a contemplated action is permitted by law or Meijer policy, we should seek the advice from the resource experts, such as the Meijer Legal Department or the Chief Compliance Officer. Accountable Compliance Officers (ACOs) are also embedded in the business units for specific regulatory areas. Please refer to the Compliance Charts link on the Meijer One Stop homepage. We are responsible for preventing violations of law and for speaking up if we see possible violations.
Because of the nature of our business, some legal requirements warrant specific mention here.

**Antitrust**
We are dedicated to ethical, fair, and vigorous competition. We will sell Meijer products and services based on their merit, superior quality, functionality, and competitive pricing. Activities or agreements that limit competition, restrict trade, or other attempts to dominate a market may violate federal or state antitrust laws. For a full description of prohibited conduct and permissible communications with suppliers and competitors, please refer to Policy 0216 Antitrust Compliance. All team members must comply.

**Anti-Corruption**
Meijer team members are expected to comply with the laws of all countries in which we do business, including the Foreign Corrupt Practices Act and all applicable anti-bribery laws. Meijer strictly forbids any bribery or corrupt payments. Meijer also prohibits facilitation or “grease” payments. All Meijer team members must comply with Policy 0080 Foreign Corrupt Practices Act Anti-Corruption.

**Undue Influence**
Meijer team members must avoid any activity that may influence or appear to influence test results or reporting of test results related to product safety, product performance, or product compliance with regulatory requirements. Influencing, manipulating, or hiding product test results, or the reporting of such results is unacceptable.

If a team member becomes aware, whether internally, through a vendor or manufacturer, or at a test laboratory, of test results being manipulated, hidden or not accurately reported, the team member is responsible for promptly reporting the circumstance to the Chief Compliance Officer. Additionally, the team member may report the circumstance to the CPSC by calling 1-800-638-2772 or filing a report at https://www.saferproducts.gov/CPSRMSPublic/Incidents/ReportIncident.aspx, if the incident involved a CPSC regulated product. Team members who influence, manipulate, or hide test results or do not report others who may have engaged in such activities are considered in violation of this policy. Such violation will result in discipline up to and including termination of employment.

**Proprietary Information**
It is important that we respect the property rights of others. We will not acquire or seek to acquire through improper means, a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution, or alteration of software or other intellectual property.

**Intellectual Property**
Meijer trademarks, service marks, and logos must always be used precisely as they are registered, and in the case of non-registered marks, as established by Meijer. This includes spelling the mark correctly, using approved formats, and using proper notice symbols, e.g. ™ SM © ®. Any variations must be approved by the Meijer Legal Department.

Any transaction that could potentially involve the use of Meijer's intellectual property by a third party must be governed by an agreement prepared by the Meijer Legal Department, containing terms that protect Meijer's intellectual property and specify the extent to which the third party may use Meijer's intellectual property. If a third party uses any of Meijer's intellectual property, including but not limited to Meijer's copyrights, patents, trademarks, service marks, or trade secrets without authorization, Meijer will seek the appropriate legal action, including prosecution. Likewise, Meijer team members must not violate the intellectual property rights of other organizations. We will comply with reasonable intellectual property usage requirements communicated by third parties with whom we have a business relationship.

Meijer owns any inventions, discoveries, ideas, concepts, works of authorship, recipes, software and other intellectual property that a team member develops during the scope of the team member’s employment. The team member will help the Company document the Company’s ownership of this type of intellectual property. Please refer to [Policy 0141 Intellectual Property](#), which governs the standards and expectations related to intellectual property at Meijer.

**Safety and Health**
Meijer is dedicated to maintaining a safe and healthy environment. We desire to provide and maintain a safe work environment for team members, and a safe shopping environment for our customers. Safety is the result of proper behavior; all team members are expected always to perform their jobs safely. Safety must be a priority regardless of the situation; no one should put safety second to any consideration. Please refer to [Policy 0017](#).
Safety Violations, which governs standards and expectations related to safety in the workplace.

**Pharmacy**

All pharmacy personnel must obey all laws and rules applicable to the practice of pharmacy at their location. Pharmacy team members who violate applicable law(s) or rule(s) will be subject to disciplinary action, up to and including termination of employment. Pharmacists should refer to the *Meijer Pharmacy Policy and Procedures Manual* for additional information. The manual is available on a portal site restricted to pharmacy personnel.

Meijer expects its pharmacists to fully discharge their corresponding responsibility regarding controlled substance prescriptions. Pharmacists should refer to *Policy 0030 Pharmacist’s Corresponding Responsibility* for additional information about this important legal obligation.

Pharmacy personnel may direct questions or concerns about legal requirements, traditionally accepted exercises of professional judgment, and the pharmacist’s corresponding responsibility to their pharmacy specialist, the pharmacy compliance officer, or the Chief Compliance Officer.

**Avoid Conflicts of Interest**

**Conflicts of Interest**

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our job duties and responsibilities. At times, we may be faced with situations where the business actions we take on behalf of Meijer may conflict with our own personal or family interests. Because the course of action that is best for us personally may not be the best course of action for Meijer, we owe a duty to Meijer to advance its legitimate business interests in these situations.

One example of a potential conflict of interest is a Meijer business arrangement with a supplier or vendor who hires an ex-Meijer member. *Policy 0028 Meijer People or Former Meijer People Representing Suppliers/Vendors* provides that former Meijer team members should not provide services for the business units where they previously worked for six-months to one-year after leaving employment with Meijer.

Some other ways in which conflicts of interest could arise:
1. Being employed (you or a close family member) by, or acting as a consultant to a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Meijer. With limited exceptions, Meijer team members may not be concurrently employed by a competitor. This rule is detailed in the Working for Competitors section of Policy 0007 Conflicts of Interest.

2. Hiring or supervising family members or closely-related persons.

3. Serving as a board member for an outside commercial company or organization that is a competitor of Meijer.

4. Owning or having a substantial interest in a competitor, supplier or contractor.

5. Having a personal interest, financial interest, or potential gain in any Meijer transaction.

6. Placing Company business with a firm owned or controlled by a Meijer employee or his or her family.

7. Accepting discounts, favors or services from a customer or potential customer, competitor or supplier, unless equally available to all Meijer team members.

If a situation is not covered or if a question exists, it is the team member’s responsibility to promptly report the circumstance to their first assistant. Advance review and written approval of a Senior Vice President may be necessary. Team members with a conflict of interest question should refer to Policy 0007 Conflict of Interest or seek advice from their first assistant, Human Resources, or the Chief Compliance Officer. Full disclosure and transparency needs to be the guiding principle. Policy 0007 Conflict of Interest governs the standards and expectations related to conflicts of interest.
Political Contributions

Team members may not express views on local, state or federal governmental issues where their comments could be reasonably construed as an expression of Meijer policy, unless they have written authorization to speak on behalf of the Company by the Vice President of Public Affairs. No team member may make or commit political contributions to individuals or committees on behalf of the Company without review by the Legal Department and written approval of the Vice President of Public Affairs. Please refer to Policy 0820 Political Activities and Contributions and Team Members Holding Public Office, which governs the standards and expectations related to political contributions and legal and regulatory compliance.

Gifts, Business Courtesies and Vendor Relationships

Meijer is committed to fair and competitive relationships with all vendors and other suppliers. We should avoid any actions that create a perception that favorable treatment of outside entities by Meijer was sought, received or given in exchange for personal business courtesies. Team members who award contracts, who can influence the allocation of business, who create specifications that result in the placement of business, and who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the Company’s reputation for impartiality and fair dealing. Generally, team members should decline offers from a vendor or supplier for anything of value. We will not request, give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that may violate laws, regulations, or policies of Meijer or its customers, would cause embarrassment, or reflect negatively on Meijer’s reputation.

We have adopted specific rules for some of the situations team members may face; if you are uncertain how to proceed in any matter, you should discuss it with your first assistant. Generally, Meijer team members should not accept business courtesies from any persons or companies with whom Meijer does or may do business. Business courtesies include gifts, gratuities, meals, refreshments, entertainment, services, sporting events, special access to events, trips, shows, or any other form of value or financial support. There are some exceptions to this provision. Here are some specific rules applicable to your relationships with vendors and suppliers:
1. **Nominal Promotional Items.** This policy does not apply to promotional gifts such as calendars, pens, etc. valued at less than $50. Any other offers from vendors or suppliers must be reported to your first assistant.

2. **Meals, Refreshments, and Entertainment.** Meijer team members may accept invitations for business meals with companies we work with in order to assist Meijer team members in the pursuit of additional dollars, services, or programs that will help strengthen Meijer sales and profitability. Such meals should be appropriate to an independent business relationship in all aspects, including the number of such meals and their cost. Unusually expensive or repetitive events should be discussed with and approved by your first assistant.

3. **Business Travel.** Vendors and suppliers may sometimes offer to pay for legitimate business expenses. These may be acceptable but require advance approval through our Vendor Event Request Form and are required to sign in using their employee ID and password. The form can be found at [http://storeapps.meijer.com/meijertravel2005/VendorEvent/vendor-event-create.aspx?page=new](http://storeapps.meijer.com/meijertravel2005/VendorEvent/vendor-event-create.aspx?page=new).

4. **Alcoholic Beverages.** Alcoholic beverages are not to be a part of a meal if a Meijer team member is returning to work, or if the purpose of the lunch or dinner meeting is to resolve a business concern that we have with a vendor or supplier. No Meijer team member will accept any gifts, loans of money, free merchandise, treats, discounts, premiums, rebates, property of any description or any item of value from a beer, wine, or alcoholic manufacturer, wholesaler, or representative. Anything offered that is in direct violation of the regulations set forth by a state alcohol control authority should be reported to your first assistant immediately.

5. **Relationships with Vendors.** An appropriate business relationship sometimes involves both work and non-work time but personal relationships can raise concerns about favoritism and objective decision-making. For that reason, you should be sure that your first assistant is fully advised of any personal relationship you have with a vendor or supplier.
**Personal Relationships: Leadership**

An appropriate business relationship for Meijer leadership with other team members is critical to maintain credibility and avoid any appearance of favoritism and preferential treatment.

Romantic or intimate personal relationships between a leadership team member and a subordinate (any team member that the leader has a direct or indirect reporting relationship with) will have an adverse effect on coworkers, productivity, and the Company's ability to maintain good legal standing.

While a leader may show empathy and support for team members, leadership should not engage in inappropriate relationships with subordinates that include, but are not limited to, dating, intimate or inappropriate personal correspondence (texts, electronic and social media, telephone calls, etc.), unwanted or prolonged physical contact, or any behavior that portrays or conveys a romantic or intimate relationship. Violations of this policy and/or [Policy 0070 Harassment](#) will result in discipline, up to and including termination of employment.

Any leadership team member engaged in a romantic or intimate personal relationship with a subordinate is required immediately to inform his or her first assistant. Such relationships may create a conflict of interest, and as a result the team members may be assigned to separate work locations, or some other appropriate action may be taken.

Failure to report a romantic or intimate personal relationship with a subordinate is considered a violation of this policy and will result in discipline, up to and including termination of employment.

**Incentives and Prizes**

Prizes, including trips, earned by store personnel through Company approved sales contests or similar programs may be accepted. Incentives earned by merchandising personnel, based upon volume purchases or sales, are the property of the Company. Incentives should be converted to cash whenever possible. If not, such incentives should be used for Company contests, drawings, or sold in sample sales.

**Samples**

Samples received for business purposes (quality checks, item set up, planogram work, etc.) should be managed through location 984 Store.
Simulation Area and not our retail units. Samples will be disposed of in the following manner:

**Testing Samples**

- Samples may be consumed or utilized by a Meijer team member at a Meijer unit or corporate office for the purpose of sampling or testing products that are being introduced in our markets.

**Domestic / Imported Samples**

- Only domestic samples that can be identified in Meijer inventory systems may be sold at the Meijer Outlet Store. All items that cannot be identified in Meijer inventory systems and do not have a UPC shall be destroyed, and as appropriate, processed through the Waste Segregation Bucket Program.

- Imported samples shall not be sold. Imported samples that can be identified in Meijer inventory systems may be donated to a Meijer approved charitable organization. Imported samples that cannot be identified in Meijer inventory systems and do not have a UPC shall be destroyed, and as appropriate, processed through the Waste Segregation Bucket Program.

**Personal Purchases of Goods and Services from Vendors**

Meijer team members may not seek or accept special arrangements for goods or services from Meijer vendors as a result of Meijer’s relationship with the vendor. If a Meijer team member conducts personal business with a vendor to Meijer, those transactions must be conducted at arm’s length. Team member must avoid transactions that create the appearance of favoritism or that may adversely affect the Company’s reputation for impartiality and fair dealing. If a team member has a direct business relationship with a vendor/supplier, they must disclose that relationship to their first assistant prior to the purchase of goods/services being performed (see Policy 0007 Conflicts of Interest).

**Accurate Reporting**

**Corporate Recordkeeping**

We create, retain and dispose of our Company records as part of our normal course of business in compliance with all Meijer policies and guidelines, as well as all regulatory and legal requirements.
All corporate records must be true, accurate and complete, and Company data must be promptly and accurately entered in our books in accordance with Meijer’s and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an internal or independent audit of Meijer books, records, processes or internal controls.

**Accountability**
Each of us is responsible for knowing and adhering to the values and standards set forth in the Code of Ethics and Business Conduct and for raising questions if we are uncertain about Company policy. If we are concerned whether the standards are being met or if others are potentially in violation of the Code of Ethics and Business Conduct, we must report this to our first assistant a Human Resources representative, the Chief Compliance Officer, or the Meijer Hotline at 1-888-691-0779.

Meijer will conduct random and unannounced policy compliance audits with various vendors and team members. The purpose of these audits is both to maintain good business practices and determine any non-compliance.

**Be Loyal**

**Confidential and Proprietary Information**
Integral to Meijer’s business success is our protection of confidential Company information, as well as nonpublic information entrusted to us by team members, customers, and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names and addresses, or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization. Please refer to Policy 0094 Confidentiality that governs the standards and expectations related to confidentiality in the workplace.

**Use of Company Resources**
Company resources including time, material, equipment, and information are provided for Company business use. Use of technology in a manner unrelated to a team member’s job is allowed only under the conditions outlined in Policy 0004 Technology Use.
Generally, we will not use Company equipment such as computers, copiers and fax machines to conduct any outside business or in support of any religious or political activity, except for Company requested support to nonprofit organizations. We will not use Company equipment to solicit or distribute in violation of Company standards and expectations involving solicitation and distribution. The standards and expectations are provided in the policies listed below:

- Policy 0254 Solicitation & Distribution Policy – Retail
- Policy 0255 Solicitation & Distribution Policy – Supply Chain
- Policy 0256 Solicitation & Distribution Policy – Corporate Campus

In order to protect the interests of the Meijer network and our fellow team members, Meijer reserves the right to monitor or review all data and information contained on an employee’s Company-issued computer or electronic device and the use of the Internet or the Meijer intranet. We will not tolerate the use of Company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of Company resources should be directed to your first assistant.

**Do the Right Thing**
Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- **Does what I am doing comply with Meijer Guiding Principles, Code of Ethics and Business Conduct and other Company Policies?**

- **Have I been asked to misrepresent information or deviate from normal procedure?**

- **Would I feel comfortable describing my decision at a staff meeting?**

- **How would it look if it made the headlines?**

- **Am I being loyal to my family, my Company and myself?**

- **What would I tell a family member to do?**
• **Is this the right thing to do?**

Under the National Labor Relations Act, non-supervisory, hourly team members have a right to communicate with one another and engage in concerted activities for their mutual benefit regarding the terms and conditions of employment. Further, various local, state and federal laws protect team members from acts of discrimination, harassment and retaliation in the workplace. Notwithstanding the provisions above, this policy is not intended and will not be applied or construed in any manner to interfere with those rights, nor will it be construed or applied to restrict any team members’ rights under any other federal, state or local laws, or any whistleblower protections under federal or state laws.

**Information and Resources**

**Related Policies**
In addition to the Meijer policies discussed in the Code of Ethics and Business Conduct, you should be familiar with and comply with the Company Policies found at the Human Resources Policy Center on the Meijer One Stop homepage and with any specific policies, procedures, training or related materials that are applicable to your business unit and duties.

**Reporting Provisions**
If you know or suspect that this policy has been violated, you must immediately notify your first assistant or one or more of the Ethics Resource Contacts listed below.

**Ethics Resource Contacts**

**Meijer Hotline**  
1-888-691-0779

**Human Resource**  
(616) 791-5401 or tie line 8-985-5401

**Asset Protection**  
(616) 791-2585 or tie line 8-985-2585

**Meijer Legal Department**  
(616) 791-2671 or tie line 8-985-3213

**Chief Compliance Officer**
Meijer team members found to be in violation of the Code of Ethics and Business Conduct are subject to discipline up to and including termination.
CERTIFICATION

I certify that I understand the provision of Policy 0026 Code of Ethics and Business Conduct and will be compliant with the values described herein. I also certify that reported all known or suspected violations to my first assistant or one or more of the Ethics Resource Contacts listed above.

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