



# CODE OF ETHICS AND INTEGRITY

Being the Trusted Partner



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## A Message from Our CEO

PetSmart is the largest omnichannel pet retailer in North America and we have earned our reputation as the trusted partner to pet parents and pets through a shared commitment by our associates and business partners to do what's right for pet parents, pets, each other and our communities, every single day.

As stewards of the PetSmart brand, each of us is responsible for ensuring that our decisions and actions uphold our values and follow ethical and transparent practices. Our Code of Ethics and Integrity, which we refer to as our Code, outlines expectations for how we do business and work together at PetSmart and our shared ethical and legal responsibilities. All associates, regardless of role or where they work, are expected to know and follow our Code.

Our Code is comprehensive, but it's not intended to provide guidance on every situation we might encounter. If a situation arises where the right decision is not clear or there is a concern about whether we are living up to the standards in our Code, we encourage you to let us know by using any of our Speak Up resources included in our Code.

All of us making ethical decisions consistent with PetSmart's values and our Code is how – every day, with every connection – we do our best for pet parents, pets, each other, our business partners and our communities.

Thank you for your commitment to PetSmart, pet parents, pets and the communities we serve.

Regards,

A handwritten signature in black ink, appearing to read 'J.K. Symancyk', with a long horizontal stroke extending to the right.

J.K. Symancyk  
President and CEO



# Being the Trusted Partner – How We Define Ethics

PetSmart is committed to doing what's right and leading with integrity at all levels of the business. Everyone at PetSmart, regardless of role, business unit or location, is expected to conduct business ethically, honestly and in full compliance with the law.

We believe that how we conduct ourselves is critical to PetSmart being the trusted partner to pet parents and pets. PetSmart's Code of Ethics and Integrity (Code) is foundational to how we do business and how we put our values into practice every day. Applying the values to everything we do demonstrates our commitment to building a strong ethical culture.

**While reviewing our Code, keep in mind that PetSmart expects everyone, at every level of the company, to:**

- Model PetSmart's culture and values
- Act with integrity and be respectful of others
- Understand and follow PetSmart policies and procedures
- Comply with all laws applicable to your job responsibilities
- Seek guidance when you have ethical questions or concerns
- Speak Up if you see or suspect misconduct

**Our Speak Up resources include:**

- Your Leader or Any Leader
- Human Resources
- Loss Prevention & Safety
- The CareSmart Hotline: 1-800-738-4693 or [visit the website](#)
- Legal Department: [EthicsandIntegrity@PetSmart.com](mailto:EthicsandIntegrity@PetSmart.com)

Your leader is a good place to start if you have questions, but if you are uncomfortable bringing your concerns to your leader or to other internal resources, CareSmart allows you to make an anonymous report through a service that is operated by an independent third party.

# Who We Are

## Our Mission

Every day with every connection, PetSmart's passionate associates help bring pet parents closer to their pets so they can live more fulfilled lives.

## Our Vision

We love pets and we believe pets make us better people. PetSmart is the trusted partner to pet parents and pets in every moment of their lives.

## Our Values



### Passion for Pets & People

We unconditionally love pets and have a passion for serving the needs of pet parents. We are devoted to helping pets live their healthiest, happiest lives.



### Accountable to the Pack

We do what's right, deliver on commitments and own the outcomes of our actions. Each of us plays an active role in growing the business and finding solutions.



### Learn New Tricks

We are always curious, try new things and learn from our mistakes. Every day is an opportunity to be better.



### Play to Win

We see each day as a competition to be won. We embrace challenges, take prudent risks and celebrate successes.



### United Together

We promote belonging and inclusiveness where individuals with diverse backgrounds and talents can excel. We know that by working together, we can accomplish great things.

## Our Commitment to Corporate Social Responsibility

Our Corporate Social Responsibility (CSR) framework, **A World Through Their Eyes**, captures a world as pets see it – one that is compassionate, inclusive, sincere and community centric. This aspirational approach is rooted in our mission, vision and values and highlights our commitment to leading with ethics and integrity and doing our best for associates, pets, pet parents, business partners and the communities we serve.

Learn more in our annual [Corporate Social Responsibility Report](#).

# OUR CODE OF **ETHICS AND INTEGRITY**

## **Why Do We Have a Code?**

We make decisions every day, and sometimes the right choice isn't clear. Our Code helps us navigate challenging situations and align our decisions with PetSmart's values, policies and high business standards. As a common point of reference, our Code also establishes the behaviors we expect of each other and helps us to make consistent choices.

Whenever you have a concern or face a difficult decision, go to our Code for guidance. Every possible situation can't be covered by our Code, but it provides the tools you need to make the right decision and provides resources for more information and support.

## **What If Our Code is Violated?**

Making poor choices can damage our reputation, compromise the safety of customers, associates and pets in our care and ultimately undermine the trust pet parents have in PetSmart.

Acting unethically or failing to follow legal requirements can lead to significant consequences for you and for PetSmart. Violating the law or our policies or otherwise acting unethically may subject you to disciplinary action up to and including termination of employment. If your actions violate the law, you might be in jeopardy of additional legal consequences.

## **Who is Covered by Our Code?**

Our Code applies to all PetSmart associates and directors. As appropriate, associates and directors will be held accountable for understanding and following our Code, PetSmart policies and procedures, as well as applicable laws.

We expect our vendors/suppliers, service providers, other business partners and their subsidiaries and affiliates that provide goods or services to PetSmart, directly or indirectly, to follow the PetSmart Supplier Code of Conduct, maintain their own code of conduct that is at least as stringent as PetSmart's Code of Ethics and Integrity and act in full compliance with all applicable laws and regulations.

## **Waiver**

In extremely limited circumstances, PetSmart may find it appropriate to waive a provision of our Code. All waivers require the pre-approval of the Chief Executive Officer or the Chief Legal Officer. Any waiver involving executive officers or directors may be made only by the Board of Directors, or a committee designated by the Board of Directors.

## Everyone's Responsibilities

PetSmart expects everyone, at every level of the company, to:

### **Live PetSmart's values**

Ensure that your decisions and actions align with our values.

### **Act with integrity and be respectful of others**

Use good judgment and don't compromise integrity for performance.

### **Review our Code and PetSmart policies and procedures**

Everyone at PetSmart is expected to review and understand how our Code applies to their role at PetSmart. PetSmart also has policies and procedures that provide more information and requirements. PetSmart may modify the content of our Code, policies, and procedures at any time without notice, so they should be reviewed often.

### **Comply with all applicable laws**

Learn what laws apply to PetSmart and your job responsibilities; ask questions if something is not clear.

### **Speak Up**

If you have questions or see or suspect misconduct, voice your concerns immediately – it is always the right thing to do, and anyone who reports misconduct or a concern in good faith will not be subject to retaliation.

## Additional Responsibilities of Leaders

Actions speak louder than words, and we hold our leaders to a higher standard. Leaders can show their commitment to our values and our Code through these actions:

### **Be a role model**

Make ethical decisions, model our values and demonstrate them in everything you do. Encourage PetSmart associates to always do what's right and report concerns. Never pressure, direct or knowingly allow an associate to violate the law or PetSmart's values, Code, policies or procedures.

### **Maintain an "open door"**

Create an environment that is safe, approachable and encourages associates to ask questions, share ideas and report concerns.

### **Take action**

Document concerns you witness or that are reported to you and escalate them through the correct channels.

### **Foster open dialogue and consistent communication**

Regularly tie our values to decisions and actions taken. Refer to our Code – it provides guidance and resources for additional information.

### **Deliver a strong anti-retaliation message**

Make it clear that retaliation for reporting an ethics concern in good faith will not be tolerated. Report immediately any concerns that you might have regarding retaliation.





# USING OUR CODE OF ETHICS AND INTEGRITY

## When to Speak Up

PetSmart is committed to conducting business in an ethical manner. Each of us has a responsibility to behave in a way that protects our business interests, our reputation and each other. If you have a good faith belief that PetSmart, an associate or a business partner is not living up to the standards of our Code or violates our policies or the law, you have an obligation to promptly report it. This includes any suspected violations shared with you by another associate.

**If you are faced with a difficult decision and you are not sure what to do ...**



Stop and take time to consider the impact your decision will have. Ask yourself if the intended course of action is consistent with PetSmart's mission and values.



Look to our Code and our policies. Consider how your decision will impact PetSmart, our customers, your fellow associates or others.



Still not sure what to do? Then ask. Our Speak Up resources, beginning with your leader, are here to answer your questions and help guide your decision.



## How Do I Ask Questions About My Responsibilities Under Our Code?

While our Code is a valuable guide, it cannot cover every situation that may arise. When the Code does not provide clear guidance, and we are not sure what to do, we have a responsibility to ask questions and raise concerns. We do not have to decide on our own how best to proceed – so please utilize our Speak Up resources.

## How to Speak Up

Start local – by knowing you or knowing the background of the situation in which the issue arose, your leader may be in a good position to understand and respond to your concern. If you're not comfortable speaking to your leader, reach out to another leader within PetSmart or one of our other Speak Up resources.

### Making the Right Decision

If you are ever in a situation where the correct choice is not clear, ask yourself



Is it legal?



Is it consistent with our values, policies and our Code?



Does it reflect our commitment to doing what's right for pet parents, pets and our communities?



If the answer to any of these is no, DON'T DO IT!



If you are not sure, stop and use our Speak Up resources. If someone else is doing it, Speak Up!



# Our **Speak UP** Resources Include:



**Your Leader or Any Leader**



**Loss Prevention and Safety**



**Human Resources**



**The CareSmart Hotline**  
1-800-738-4693



**Legal Department**  
[EthicsandIntegrity@PetSmart.com](mailto:EthicsandIntegrity@PetSmart.com)



or [visit the website](#)

Your leader is a good place to start if you have questions, but if you are uncomfortable bringing your concerns to your leader or to other internal resources, CareSmart allows you to make an anonymous report through a service that is operated by an independent third party.

## Zero Tolerance for Retaliation

When you speak out against things that are wrong, you uphold our values and our Code. We respect those who raise concerns about misconduct or potential misconduct.

PetSmart does not tolerate retaliation for reporting a concern in good faith or participating in an investigation. Good faith means that your concern is honest and accurate to your knowledge, even if it is discovered later that you were mistaken.

Anyone who engages in retaliation will be subject to discipline, which may include termination of employment. Discouraging others from reporting an ethics concern is also prohibited and could result in disciplinary action.

# What Happens Next?

All reports of misconduct are taken seriously, and we investigate them when appropriate. If a report is substantiated, PetSmart will take prompt and appropriate action. If you make a report, you will be notified when the matter is resolved.



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# Taking Care of Pets and Pet Parents

## Protecting Pet Health and Safety

At PetSmart, protecting the health, safety and well-being of pets is at the core of our values and must remain central to every decision we make about the products we sell, the pets in our stores and the services we provide. By performing in this manner, we earn the trust of pet parents.



If you have any questions or need to report any concerns regarding the safety or health of pets, immediately contact the Regional Loss Prevention and Safety Partner or one of our other Speak Up resources.



## Learn New Tricks

**Q:** A pet parent brought her dog in for grooming. While performing a hands-on pet assessment, I noticed that the dog's coat was severely matted. I didn't feel that we could groom the pet without causing injury. I declined performing the service and recommended that the pet parent have her dog groomed at a veterinarian. Did I do the right thing?

**A:** Yes. Putting pet health and safety first is how we maintain PetSmart's reputation as a trusted partner. Declining the service and advising the pet parent to visit the veterinarian shows her

that we care for the safety and well-being of her pet. If you are ever unsure what the right decision is, please ask your leader for guidance.

## Creating An Excellent Customer Experience for Pet Parents

Our goal is to create an excellent customer experience for pet parents by providing a safe shopping environment and respecting every person who enters our stores. We must never treat our customers less favorably or with bias based on characteristics such as race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status or other legally protected characteristics.



## Learn New Tricks

**Q:** I noticed that a fellow associate sometimes follows and monitors customers in the store who are dressed in a certain way. This associate has also made comments about these customers and theft. Acting in this manner seems wrong to me. What should I do?

**A:** If you have reasonable doubts about whether customers are being treated with respect, or if you observe fellow associates behaving in ways that cause you concern, immediately report it to one of the Speak Up resources.

For more information, refer to the [Anti-Discrimination, Harassment and Retaliation Policy](#) and other applicable policies on Fetch.

## Providing Safe Pet Food and Products

Pet parents rely on us to ensure the quality and safety of the food and products we provide for their pets. We comply with all applicable food and product safety laws, and we expect the same of our vendor and merchandise partners.

We select vendors who share our commitment to safety and who have the expertise and experience to meet our high standards and expectations. We require partners that supply our proprietary brands to submit to testing and verification processes that ensure they adhere to the requirements we set.

If an issue arises that could pose a risk to the safety of our pet food or products, we take swift action to investigate the issue and, where necessary, withdraw or recall products from our stores.



If you have a concern regarding the safety of our food or products, including concerns about a vendor compromising our safety standards, report it to one of our Speak Up resources.

## Ensuring Our Marketing and Advertising Is Truthful

Our customers expect our marketing communications to be truthful and provide the information they need to make sound purchasing decisions. We follow truth-in-advertising laws and provide customers with accurate and complete information about our products and services.

We follow standard processes to confirm that descriptions and claims regarding our products and services are truthful and have been adequately substantiated.



## Protecting Customers' Privacy

Pet parents trust us to handle their personal information with care and we take that responsibility seriously. We collect, use, retain and share customer information according to applicable laws and our privacy policies, and take appropriate steps to protect it from loss, misuse or unauthorized disclosure.

We expect all associates to protect the personal information of pet parents, associates and partners, and follow all applicable data privacy laws and PetSmart policies for collecting, storing, using, sharing and disposing of personal information.

If a customer's personal information is suspected to have been or has been lost, misused, or improperly accessed or disclosed, immediately contact your leader or Information Security at [Threat@PetSmart.com](mailto:Threat@PetSmart.com).



### Learn New Tricks

**Q:** A fellow associate told me that when customers don't want to share their phone number to receive Treats points, I should use the phone number of one of our regular pet parents to reward them more points. This seems like a benefit for our best customers. Can I follow this advice?

**A:** No. Never use our customers' personal information in a way that is not set out in our policies and procedures. If you believe an improper disclosure has occurred, you should contact your leader or Information Security at [Threat@PetSmart.com](mailto:Threat@PetSmart.com). You may also contact one of our other Speak Up resources.

For more information, please see the [Data Classification Policy](#) and the [Data Privacy Protection and Reporting Policy](#) on Fetch.





# Taking Care of Our Associates

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# Taking Care of Our Associates

## Maintaining a Safe Work Environment

We are committed to creating and maintaining a safe shopping and work environment for associates and business partners. Our culture of safety requires each associate to commit to being a safety advocate and to follow all laws, health and safety regulations, policies and procedures and safety programs that apply to their role.

All of us have an obligation to familiarize ourselves with any hazards in our work area, stay up to date on training and report any incidents, injuries, near-misses or unsafe conditions as soon as possible.



### Learn New Tricks

**Q:** One of my co-workers was in a hurry and I don't think they used the proper restraint when working with a pet. What should I do?

**A:** If you are ever unsure of what safety rules or procedures apply to your role or if you become aware of any conditions or conduct that may threaten the safety of people or pets, report the situation immediately to your leader or another of our Speak Up resources.

## Threats and Violence

We prohibit violence, threats of violence and intimidation in the workplace. Any violence, threat of violence, intimidation or other behavior that has resulted or could potentially result in harm to associates, customers, pets or others on PetSmart property must be immediately reported through one of our Speak Up resources.

In accordance with local laws, associates are not permitted to possess weapons of any kind on PetSmart property (stores, distribution centers or offices), unless authorized in writing by PetSmart.



If you believe there is an immediate danger, you should refer to PetSmart's emergency response procedures or dial 9-1-1.

For more information, refer to the [Workplace Violence Prevention Policy on Fetch](#).

## Substance Abuse

Substance abuse can prevent associates from doing their job safely and jeopardize the safety of others or the pets in our care. We must never work or conduct PetSmart business while under the influence of alcohol or drugs. The use, consumption or possession of any drug or controlled substance that isn't used or obtained legally (including prescription drugs that have been prescribed to someone else) is prohibited. Consuming alcohol on PetSmart property or at PetSmart functions is not permitted, with the exception that associates of legal drinking age may consume alcohol in moderation at authorized company functions as permitted by their leader.

For more information, refer to the [Drug and Alcohol Free Workplace Policy on Fetch](#).

## Protecting Associates' Privacy

Our associates trust us to handle their personal information with care and we take that responsibility seriously. We collect, use, retain and share associate information according to applicable laws and our privacy policies, and take appropriate steps to protect it from loss, misuse or unauthorized disclosure.

We expect all associates to keep the personal information of associates confidential and follow all applicable data privacy laws and PetSmart policies for collecting, storing, using, sharing and disposing of personal information.

If an associate's personal information is suspected to have been or has been lost, misused, or improperly accessed or disclosed, immediately contact your leader or Information Security at [Threat@PetSmart.com](mailto:Threat@PetSmart.com).



### Learn New Tricks

**Q:** I'm a Store Leader, and I received an email that says it is from the Phoenix Home Office asking me to provide a list of the names and Social Security numbers for all associates in our store. The email says that providing this information is critical and should be sent right away. What should I do?

**A:** Always be wary of sharing associates' personal information unless you are certain the request is valid. The email you received might be a "phishing" attempt by someone outside of the company to obtain customer or associate personal information or PetSmart confidential information. Do not respond to requests or open attachments from unknown sources. When in doubt, talk to your leader or report the request to [Threat@PetSmart.com](mailto:Threat@PetSmart.com) so that they can verify the validity of the email.

For more information, refer to the [Data Classification Policy](#) and the [Data Privacy Protection and Reporting Policy on Fetch](#).

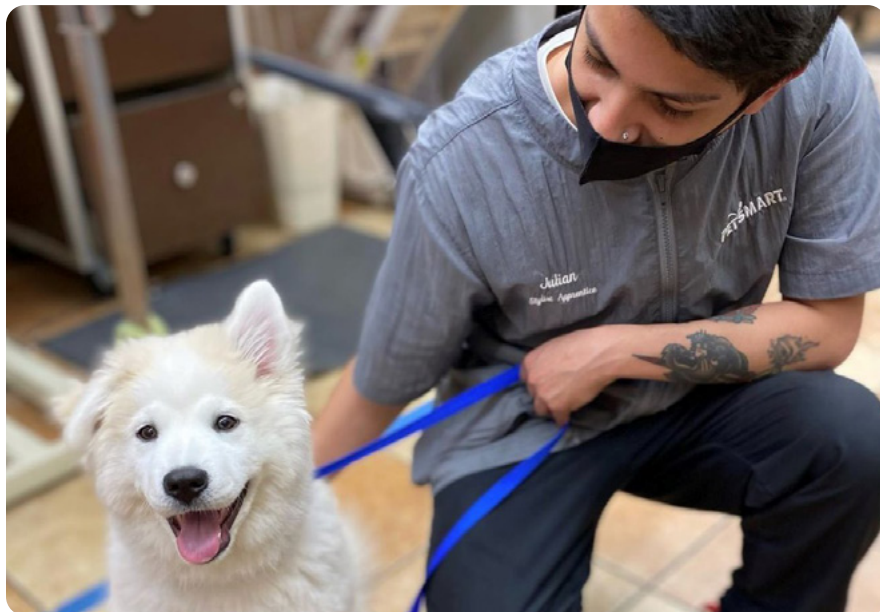


## Recording Time Accurately

We follow all employment laws, including those involving wages earned and hours worked. We are committed to ensuring our associates are paid for their work fairly, accurately and in a timely manner, and failing to do so is against our values. Associates working “off the clock” is strictly prohibited by the Code, our policies and the law.

Hourly associates are required to use our timekeeping system to accurately record all time worked, including time worked outside of normal schedules. Our meal and break period requirements are also essential to ensuring that associates are properly compensated; all associates are required to follow those requirements. All time worked by an associate must be reported and may never be modified to meet business objectives.

If an associate misses recording their work time accurately, they are required to inform their leader so their time recorded can be corrected. If an associate thinks there is an error on their paycheck, they should inform their leader immediately so it can be addressed.



Just as associates should never record time not worked, associates may only record their own time and should never record time for another associate.

Leaders of non-exempt associates are responsible for ensuring that all allowed time worked by associates is accurately recorded and that associates abide by our meal and break period requirements. Associates should immediately report being instructed to work off the clock or other concerns about wage and hour issues to one of our Speak Up resources.



### Learn New Tricks

**Q:** A fellow associate forgot to clock out at the end of her shift over an hour ago. She contacted me and asked me to sign her out at the time she left. What should I do?

**A:** You cannot help her with her request. Our policy is clear: we never record time for another associate. Your fellow associate is responsible for recording her own time and requesting an approved adjustment to her recorded stop time. She should contact and work with her immediate leader or the leader on duty to request an adjustment.

For more information, refer to the [Associate Pay Policy](#) and the [Work Hours and Work Week Policy](#) on Fetch.



# Respecting Each Other

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Equal Opportunity

Harassment, Discrimination or Similar Behavior

# Respecting Each Other

## Diversity, Equity, Inclusion and Belonging

We are diverse by nature and inclusive by choice. Our value *United Together* calls on us to promote a culture of belonging and inclusiveness where individuals with diverse backgrounds, experiences and talents can excel. We know that creating and maintaining an inclusive culture is the right thing to do and makes PetSmart a stronger company for pet parents, pets, each other, our business partners and our communities.

At a personal level, each of us is expected to contribute to PetSmart's culture of belonging by treating other associates, customers and business partners fairly and with courtesy and respect.

## Equal Opportunity

PetSmart is an equal opportunity employer that is committed to maintaining a culture of inclusion and diversity. We provide an equal opportunity for all associates and job applicants without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status or other legally protected characteristics. We hire applicants and retain and evaluate associates based only on job-related factors such as their skill, performance, integrity and commitment to our goals.

We are committed to providing reasonable accommodations for qualified individuals with disabilities, both visible and invisible, during the job application process and throughout their career at PetSmart. If you need assistance or an accommodation due to a disability, contact us at [Accommodations@PetSmart.com](mailto:Accommodations@PetSmart.com) or 1-866-263-8411.

## Harassment, Discrimination or Similar Behavior

PetSmart is committed to an environment that is free from harassment and discrimination. We do not tolerate any behavior that diminishes the dignity of a person, inappropriately or unreasonably interferes with work performance, or creates an intimidating, hostile or otherwise offensive environment.

We do not tolerate retaliation against anyone who, in good faith, raises a concern about harassment or discrimination. Anyone who engages in retaliation will be subject to disciplinary action, which may include termination of employment.

Harassment is conduct connected to a protected characteristic that creates a disrespectful, intimidating, hostile, degrading, humiliating or offensive environment. Harassing behavior is about impact – how others *perceive* an action, not intent. It can occur on or off the clock, may involve members of the same or opposite sex, happen on or off PetSmart







property, be committed by an associate, pet parent or business partner, or take place in person or via email, text or on social media. Examples of harassment include, but are not limited to:

- Making offensive comments, slurs, gestures or jokes
- Stereotyping or disparaging someone based on a protected characteristic
- Being verbally or physically threatening, intimidating or abusive
- Making sexual advances, engaging in unwanted touching or pressuring another to participate in a personal relationship
- Displaying or electronically sharing offensive photos, videos or derogatory slogans in the workplace
- Modifying work schedules, work location or job duties to avoid dealing with an issue

Behavior that creates an unwelcome, intimidating, hostile or offensive environment is not tolerated and should be reported immediately to one of our Speak Up resources.



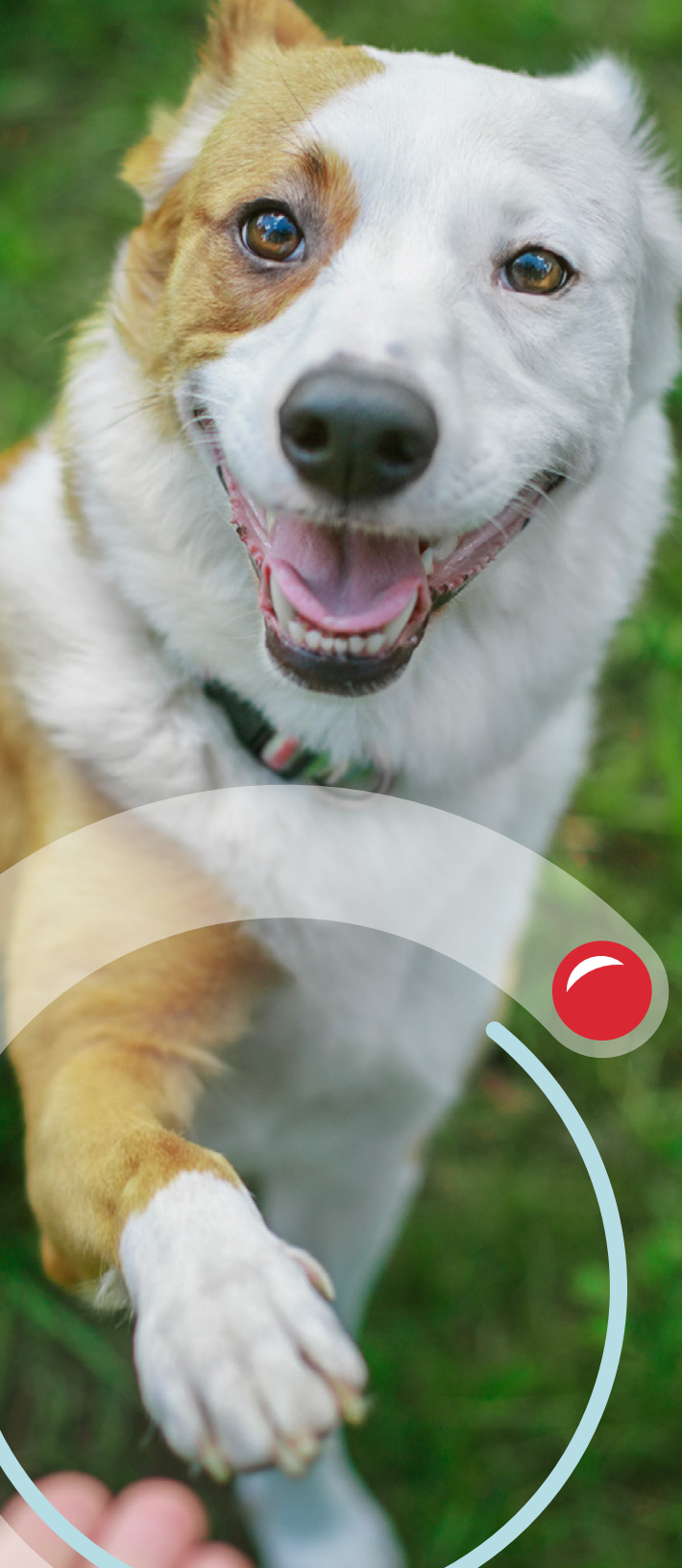
## Learn New Tricks

**Q:** There was a post on Central Bark highlighting an associate at my store. Other associates at my store have told me that they don't like working with the highlighted associate because he is "old," and they have to work harder because he is "slow." I noticed comments on the Central Bark post referring to the highlighted associate as "slow poke" and "the snail." What should I do?

**A:** PetSmart does not tolerate any behavior that is disrespectful, intimidating, hostile or that otherwise creates an offensive environment; this includes any content shared on Central Bark. If you see something you reasonably believe to be inappropriate on Central Bark, you can prompt a review by administrators by flagging it. You should also immediately report it to one of our Speak Up resources.

For more information, refer to the [Anti-Discrimination, Harassment and Retaliation Policy](#) on Fetch.





# Acting With Integrity

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# Acting With Integrity

## Communicating Responsibly

### Media Inquiries

Our external communications shape our brand, so we must ensure that our messages are consistent, reflect our values and are delivered only by those authorized to speak on PetSmart's behalf.

If you are not authorized to speak on PetSmart's behalf, anytime you communicate in a public forum, whether online or otherwise, you must make it clear that you are doing so in a personal capacity and are not representing or speaking for PetSmart.

If you are contacted by anyone requesting in-store photography, TV coverage or any other media inquiries, including social media, or if you are asked to comment on PetSmart's behalf, refer them to the Corporate Communications 24-Hour Media Line (623-587-2177).

### Social Media

We know that many associates want to share their passion for pets and people by using social media forums, blogs or public message boards. Messages posted by an associate can impact their reputation and the reputation of PetSmart. Any associate who expresses a personal view on social media should use common sense and good judgment and make it clear that any opinions expressed are their own and do not reflect those of PetSmart. Other guidelines to follow include:

- If you give an opinion, you must not create the impression that you represent PetSmart or are expressing the views of PetSmart.
- Never reveal confidential business information, including financial information or information about customers or associates.

- Never engage in harassing behavior or make defamatory or discriminatory statements regarding customers or your fellow associates.
- Associates who comment on our products and services through their social media accounts must disclose their connection to PetSmart.
- Respect trademark, copyright and other associated laws.



### Learn New Tricks

**Q:** PetSmart is offering a discount for first-time customers in our grooming salon, and I would like to share it with my friends on social media. Can I do this?

**A:** You are generally free to share or re-post a PetSmart promotion that has been made available to the public, but you must disclose your connection with PetSmart. After ensuring that the first-time customer discount has been communicated to the public, you may share it with your friends on social media if you include a statement indicating that you work at PetSmart.

For more information, refer to the [Social Media Policy](#) and the [Anti-Discrimination, Harassment and Retaliation Policy](#) on Fetch.





## Avoiding Conflicts of Interest

All work related decisions that associates make must be in the best interest of PetSmart. When personal activities interfere with or influence decisions made on behalf of PetSmart, there is a conflict of interest.

Even potential conflicts of interest can appear to bias decision-making and damage trust with our customers, business partners and associates.

Not only do we expect associates to avoid actual conflicts of interest, we also expect associates to avoid situations that may give the appearance of a conflict of interest. Anytime a potential or actual conflict of interest might reasonably exist, it must be immediately disclosed to Human Resources or the Legal Department so that a discussion and evaluation of the individual circumstances can occur.



## Outside Employment and Business Interests

An associate with outside employment, an independent business venture or who otherwise provides consulting or other services outside of PetSmart to a competitor or business partner, including suppliers, vendors or contractors, must disclose those activities to Human Resources for prior approval.



### Learn New Tricks

**Q:** After grooming at PetSmart for a few years, I believe several pet parents would hire me to groom their dogs outside of PetSmart. Is it okay to groom dogs on the side while still working for PetSmart?

**A:** No. Grooming dogs while employed by PetSmart constitutes a conflict of interest. If you have questions regarding outside business opportunities, contact Human Resources.

## Financial Interests

Investments or other financial interests that could interfere, or appear to interfere, with the ability to make decisions in the best interest of PetSmart should be avoided.

Two examples of financial interests that must be disclosed to Human Resources and the Legal Department are:

- You or a family member has a substantial financial interest (excluding an interest of less than 1% in the stock of a publicly traded company) in a PetSmart competitor or business partner, including suppliers, vendors or contractors.
- You transact business on behalf of PetSmart with a company in which you or a family member has a substantial financial interest.

## PetSmart Business Opportunities

Through your work at PetSmart, you may become aware of certain business opportunities. Those opportunities belong to PetSmart. You may not take any opportunity for business or profit that belongs to PetSmart, or share business opportunities with anyone outside of PetSmart, without first obtaining approval from both Human Resources and the Legal Department.

## Personal Relationships

We recognize and respect that associates may have close personal and familial relationships with, and socialize with, other associates outside of work. You should use good judgment to make sure these relationships don't negatively impact your work for PetSmart, the work environment or your ability to supervise others.

We must not exhibit favoritism or open displays of affection or base any business decisions on emotions or friendships; our business decisions must be made only in the best interest of PetSmart.

If you are related to or have a romantic or close relationship with an associate you directly or indirectly supervise or if you are involved in any relationship that could create a real or perceived conflict of interest, you must immediately disclose the relationship to Human Resources and your leader.

If an associate with whom you already have a romantic or personal relationship comes under your supervision due to a position change, immediately disclose the relationship to Human Resources and your leader.

If you are unsure whether a relationship might create a conflict of interest, you should disclose it.



## Learn New Tricks

**Q:** I recently started dating an associate at a different store. Is this okay?

**A:** The answer will depend on your roles and whether the relationship could create the appearance of favoritism or a conflict of interest. You should disclose the relationship to your leader, Human Resources, the Legal Department or one of our other Speak Up resources.

## Supplier Relationships

Before participating in the selection of a supplier which employs your family member, personal friend or romantic partner, you must disclose the relationship to Human Resources and the Legal Department.



## Learn New Tricks

**Q:** My brother has a company that designs and sells innovative pet products. I would like to hire his company to design some products for PetSmart. Can I do this?

**A:** No. This poses a conflict of interest because your brother has a substantial financial interest in the company which could interfere, or appear to interfere, with your ability to make decisions in the best interest of PetSmart. If your brother would like to pursue business with PetSmart, you must disclose that he owns the company to your leadership, Human Resources and the Legal Department and remove yourself from the decision-making process.

## Gifts and Entertainment

Exchanging gifts and entertainment with our vendors/suppliers, service providers and other business partners is one way to strengthen business relationships; however, these exchanges can be inappropriate, and in some cases illegal. We should not accept or offer gifts or entertainment if doing so is intended to influence or could affect, or appear to affect, impartial decision-making.

- Associates must comply with our Gifts and Entertainment Policy and with our Anti-Corruption Policy, which set forth additional restrictions and requirements.
- All gifts, meals and entertainment that PetSmart associates offer or accept must serve a legitimate business purpose, be reasonable and appropriate in the context of the business occasion and never reflect poorly on PetSmart's reputation.



### Learn New Tricks

**Q:** I've been asked to participate in a local vendor-sponsored golf event at which I will be playing with several of the vendor's employees. May I attend the event?

**A:** Participating in the event may be acceptable. Prior to accepting the invitation, refer to our Gifts and Entertainment Policy and any department policies to determine if participation is allowed and what approvals are required. If participating would impair your ability to be objective or otherwise influence or appear to influence a decision about the vendor, you should decline the invitation.

Conflicts of interest can be confusing, and the line between professional and personal interests can easily become blurred. If you believe that an actual or perceived conflict exists, disclose it to Human Resources so that it can be addressed or avoided.

For more information, refer to the [Policy and Procedure Library](#) on Fetch.



## Conducting Business Fairly

### Keeping Accurate Business Records

The integrity and accuracy of our business records helps fulfill our obligations to provide accurate and timely financial results to investors, creditors, government agencies and other stakeholders and also ensures that internal decision-making is based upon accurate and complete information.

Business records include financial records and any other document that needs to be created and managed including medical claim forms and personnel records, whether written or electronic. We must always cooperate with financial and internal audits and follow our policies and the law when issuing and filing any reports.

All internal processes and controls must be followed when creating business records. Even if you are not responsible for the preparation of financial reports or disclosures, you are responsible for the accuracy of the business records you prepare that might be included in results. You should never falsify a business record, report misleading information or hide, alter or disguise any business transaction.

Be sure to retain all business records in accordance with our [Enterprise Records Retention Schedule](#) for the type of record you have created or are managing. The Legal Department or Tax Department may also direct you to put records on “hold.” In those situations, do not destroy or move those records, even if the Enterprise Records Retention Schedule says you may do so, until those documents have been released by the department that informed you of the hold.

Immediately report allegations of falsified financial records or interference with our internal controls. If you have any questions about creating or maintaining business records, contact your leader.

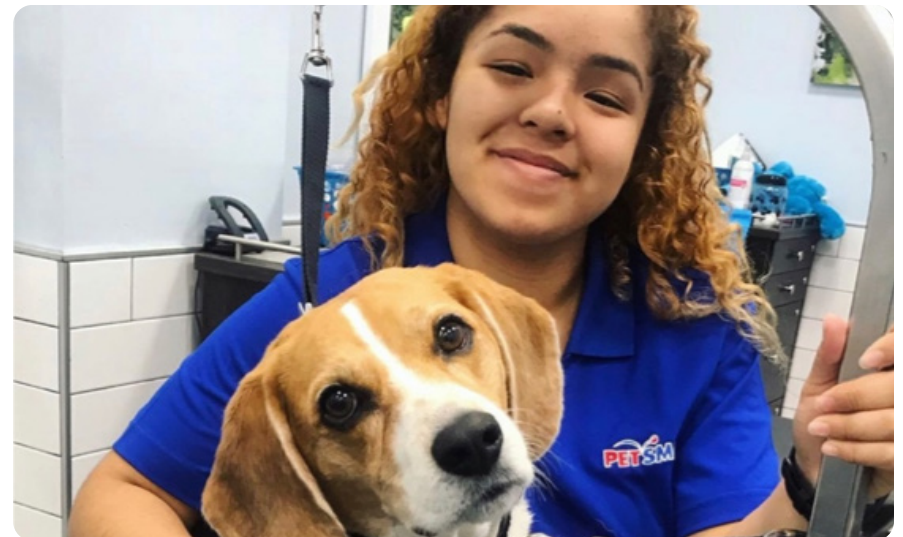
## Trading Securities Lawfully

While working for PetSmart, you may be exposed to material information about PetSmart or another company that is neither public nor widely disseminated and that a reasonable investor would think is important in making a trading decision. This includes information about an upcoming merger or acquisition, a new strategy, serious business risks, sales, negotiations or other financial information.

Buying or selling any securities, whether they are PetSmart securities or those of another company, using any material, information (“insider trading”) is illegal and is never permitted. Providing material information to others so that they might trade on such information (“tipping”) is also illegal and not allowed by PetSmart.



If you know about a potential or accidental disclosure of material, non-public information, or if you have questions or concerns about trading, please contact the Legal Department.



## Avoiding Corruption and Bribery

PetSmart is committed to following all applicable laws and will not compromise our integrity or reputation to achieve a business goal. We comply with anti-bribery laws and no associate, person or company working on PetSmart's behalf may authorize, offer or pay a bribe.

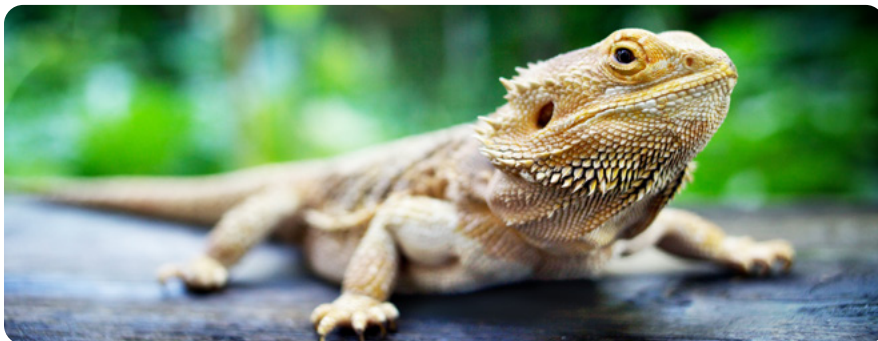
A bribe is something of value offered or accepted, directly or indirectly, to influence decision-making or secure business and can include:

- Cash or a gift card
- A gift or entertainment
- An offer of employment for family members
- A charitable or political contribution

Bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA), apply to our business and have specific requirements regarding keeping accurate books and records and maintaining effective financial controls.

We can be held accountable if one of our business partners makes or attempts to make a bribe on our behalf. If you work with government officials or hire a business partner to work with government officials on PetSmart's behalf, please refer to our Anti-Corruption Policy for additional information.

If you have any questions regarding anti-corruption or bribery, please contact the Legal Department.



### Learn New Tricks

**Q:** A logistics partner told me that a reasonable “fee” paid to the right person will get our products released from an overseas port controlled by a foreign government agency. The partner suggests that he pay the “fee” for us. Is this okay?

**A:** No. We do not allow our partners to engage in any acts we cannot engage in ourselves. Even small payments to foreign government officials are illegal under many laws, and making such payments is always against our policy.

For more information, refer to the [Anti-Corruption Policy](#) on Fetch.

## Competing Fairly

We believe that everyone benefits from a competitive marketplace, so we follow all laws that promote competition in the locations where we operate and take care to avoid even the appearance of unfairly restricting another company's ability to compete. We also don't speak dishonestly about our competitors, and we don't seek competitive information using unethical or illegal means.

When dealing with our vendors, competitors or other business partners, we must never enter into an agreement – not even an informal or verbal understanding – that is intended to, or appears to be intended to:

- Fix or set prices
- Divide or allocate markets, customers or territories
- Improperly tie or bundle services by conditioning the purchase of one product or service on the purchase of another
- Boycott another company



If any of the topics in this section come up while you're interacting with a vendor, competitor or business partner, immediately stop the conversation and make it clear that you cannot participate in such discussions or arrangements. Report any such incidents to your leader and the Legal Department immediately.

Competition issues can be complex, please contact the Legal Department if you have any questions or need to report any concerns.



### Learn New Tricks

**Q:** While I was attending an event sponsored by one of our vendors, a buyer from a competitor approached me and suggested that her company and PetSmart work together to negotiate better prices from vendors. Is it okay to discuss this?

**A:** No. We cannot coordinate with our competitors. You should tell the buyer we are not interested, then immediately end the conversation and report it to your leader and the Legal Department.

For more information, refer to the [Policy and Procedure Library](#) on Fetch.



## Preventing Money Laundering

Money laundering is an illegal activity where individuals or organizations attempt to make money from criminal activity (such as terrorism, drug dealing or human trafficking) appear legitimate by funneling it through legitimate business transactions.

All associates should be on alert for transactions that might signal this type of activity. Signs of potential money laundering include business transactions in which a customer or business partner:

- Makes large purchases of gift cards
- Provides vague or fictitious information
- Asks for an unusual transaction that has no business purpose
- Gives unusual payment instructions, has an odd transaction pattern or payment instructions
- Changes the terms of an agreement or payment at the last minute



If you notice any of these signs or any other suspicious activity, immediately alert your leader or one of our other Speak Up resources.

## Following International Trade Laws

Some of the products we source, sell or use are bought from or sold to foreign partners. There are complex laws that govern imports and exports, including requirements for conducting business internationally, paying duties and taxes, complying with permitting and licensing laws and other related activities. We must follow all applicable laws and regulations that govern this part of our business. If your role involves duties related to importing or exporting any products or technology, you must follow these laws.

When the U.S. government or another government imposes sanctions on certain individuals, groups or countries, PetSmart must abide by these restrictions, which may prohibit business transactions with those named in the sanctions.

Some business partners may want PetSmart to join them in boycotting a certain group or country. If you ever receive such a request, refuse it and immediately inform your leader and the Legal Department or one of our other Speak Up resources.

If you have reason to believe that a business partner is violating an applicable trade law, behaving unethically or potentially violating PetSmart's commitments, voice your concerns immediately.



If you have any questions about sourcing, trade laws, boycotts or sanctions, please contact your leader or the Legal Department.



## Protecting PetSmart Resources

### PetSmart Confidential and Proprietary Information

PetSmart confidential information, including financial information, operational data, customer and associate data, employment records and business plans, is protected from unauthorized disclosure and its use is limited to legitimate business purposes. All associates and business partners are required to follow policies, procedures and security measures designed to control access to, use, storage and transfer of PetSmart confidential information.

Before PetSmart confidential information is shared with anyone outside the company, proper authorization is required in accordance with PetSmart policies, including, if applicable, entering into a non-disclosure agreement. PetSmart associates have an ongoing duty to protect PetSmart confidential information even after their employment with PetSmart ends.

If PetSmart confidential information is suspected to have been, or has been, lost, misused or improperly accessed or disclosed, you must immediately contact Information Security at [Threat@PetSmart.com](mailto:Threat@PetSmart.com).



### Learn New Tricks

**Q:** I travel frequently in my role at PetSmart and often must discuss confidential business plans with fellow associates while I'm on the road. Sometimes I have these conversations on my cell phone while I'm in a taxi or taking public transportation. Is that okay?

**A:** No. To safeguard against making unintended disclosures, when you're discussing or handling our confidential information you must avoid conversations in public areas and ensure that appropriate precautions are taken when using public wi-fi and company-issued devices. Our priority when using confidential information is keeping it safe and not revealing it to people with no business need to know.

For more information, refer to the [Data Classification Policy](#) and the [Data Privacy Protection and Reporting Policy](#) on Fetch.

## PetSmart Intellectual Property

We all share a responsibility to protect and use PetSmart's intellectual property assets by following all policies and procedures for developing, protecting and enforcing PetSmart's intellectual property rights. Anything we create at PetSmart may be considered intellectual property, including new brands, marketing campaigns, artwork, product designs and business innovations. You should also be aware that any intellectual property you create as part of your work for PetSmart belongs to the company.

We also respect the intellectual property of others, including our business partners, and take care to ensure that our business activities do not infringe on the intellectual property rights of others. Failure to do so could result in significant legal and financial consequences for the company.



If you have any questions about PetSmart intellectual property, including appropriate use of our trademarks, protecting intellectual property or concerns about intellectual property infringement, misuse or misappropriation, contact the Legal Department.

## PetSmart Business Assets

Business assets include physical assets (merchandise, fixtures and office furniture), technology assets (computer hardware, software, electronic networks and access to systems) and financial assets (funds, credit cards and other accounts). They must be used only for appropriate business purposes and be protected from theft or abuse.

Unless authorized, physical assets should never be removed from PetSmart property nor should they be used for personal gain. You are expected to report theft, attempted theft, property damage and inappropriate uses of physical assets immediately to your leader.

All information and communications sent from, received by or stored in PetSmart's computer or network systems belongs to the company. Any use of company technology is not private, and PetSmart may access

and review the information you send, receive or store. Protect and use PetSmart technology assets for only PetSmart business and return them immediately upon request or change of work arrangement.

Using our assets appropriately also means making responsible decisions about how we spend the company's money. You should always act only within your approved authority when negotiating binding agreements, signing documents or otherwise acting on behalf of PetSmart. If you are unsure of your authority limit, you should discuss it with your leader or contact the Legal Department.



## Learn New Tricks

**Q:** A vending machine company contacted me about putting snack machines in some of the stores in my district. Can I sign an agreement to do it?

**A:** You must always act only within your approval authority. Before making any agreement on behalf of PetSmart, you must make sure you have the authority or have secured the appropriate approvals. If you are ever unsure about your approval authority, you should discuss it with your leader.







## Responding to Government Requests

PetSmart cooperates with reasonable requests for information from government agencies and regulators. Please refer to the appropriate Policies and Procedures to determine how to interact with government agencies and regulators and communicate a government contact to the correct department for review. Do not respond to a subpoena, request for an interview or other non-routine request without first speaking with the correct corporate contact in accordance with our policies.

If legal papers or communications are received, forward the request and document in accordance with the [Enterprise Legal Papers Policy](#).

### Process Servers (U.S. Locations Only):

PetSmart does not accept Service of Process at our retail locations, distribution centers or our offices.

If a process server appears at a company location attempting to serve legal documents, please advise them that you are not authorized to accept service on behalf of PetSmart and that any service of process for PetSmart entities should be served on our Registered Agent for Service of Process.

## Giving Responsibly

PetSmart is committed to making positive change through charitable giving and community partnerships. We support initiatives that address the goals and needs of the communities we serve through PetSmart Charities, the PetSmart Associate Assistance Foundation and other efforts.

Our passion for pets and people inspires many of us to enrich our communities by supporting charitable causes. We encourage you to become involved in your community by supporting non-profit causes that share PetSmart's values. Make sure any volunteer activities that you undertake are lawful and don't create a conflict of interest with the work you do at PetSmart.

All associates who engage in volunteer activities, even if associated with PetSmart, do so on a voluntary basis and assume the risks of injury or harm associated with their participation. Associates will only be compensated for their time while engaging in volunteering activities in accordance with the Volunteering Policy.

For more information, refer to the [Volunteering Policy](#) on Fetch.



# Supporting Our Communities

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# Supporting Our Communities

## Respecting Human Rights

We respect fundamental human rights and believe every person deserves to be treated with dignity and respect.

- We do not use forced or involuntary labor.
- We comply with all applicable child labor laws and laws against human trafficking.
- We follow all applicable labor and employment laws, including those governing working hours, fair wages and health and safety.
- We also recognize and respect laws that address freedom of association, privacy and equal employment opportunity.

We select and work only with partners, including suppliers, who share our values and demonstrate an ongoing commitment to human rights.

## Maintaining a Responsible Supply Chain

PetSmart is dedicated to maintaining a responsible supply chain and we seek business partners also committed to ethical business practices. Our Supplier Code of Conduct requires vendors/suppliers, service providers and other business partners and their subsidiaries and affiliates that provide goods or services to PetSmart directly to comply with specific requirements regarding human rights, product quality and pet health and safety, maintain their own code of conduct that is at least as stringent as PetSmart's Code of Ethics and Integrity and comply with applicable laws and regulations.



If you become aware of or suspect that any of our suppliers are not meeting our expectations, please contact your leader and the Legal Department or use one of our Speak Up resources.



## Learn New Tricks

**Q:** When visiting a supplier, I saw what appeared to be unsafe working conditions in the supplier's facility. What should I do?

**A:** You should immediately inform your leader and the Legal Department or contact CareSmart. We require all of our suppliers to comply with all applicable laws as well as our Supplier Code of Conduct.





## Participating Responsibly in Politics

PetSmart's political activities are coordinated to ensure that any positions we may take and initiatives we may support are consistent with our values. All decisions regarding PetSmart's position on an issue and any political contributions are made through the Corporate Office in conjunction with the Chief Legal Officer. Any position on a political cause or activities in support of or against a matter or candidate that is not approved by and issued through the Corporate Office is not endorsed by and cannot be attributed to PetSmart.

You are encouraged to participate in the political process and engage in activities that improve our communities. If you contribute time or money to political activities, make it clear that you are acting on your own, and not on behalf of PetSmart. You must never use PetSmart's name or suggest that PetSmart endorses any political cause or candidate. You also may not use your position at PetSmart to pressure other associates to make political contributions or to support or oppose issues or candidates. Finally, you may not use PetSmart resources or services for political purposes unless you receive prior approval from the Chief Legal Officer.



### Learn New Tricks

**Q:** I'm supporting a local political candidate and have been asked to help make copies of a flyer. Is it okay to make copies using the printer at the store when it is not in use?

**A:** No. You cannot use PetSmart assets, such as the printer and the paper, for political campaigns or causes. Additionally, you cannot leave the impression that PetSmart endorses any cause or candidate by using PetSmart assets.



## Protecting the Environment

At PetSmart, we are committed to being responsible stewards of our environment by mitigating and reducing our operational impacts on the planet. Our love of pets drives our respect for nature and how much they rely on fresh air, water and green spaces to thrive. That's why we are committed to reducing our environmental impacts and contributing to a healthier planet. This commitment extends to our operations, supply chain and the products we carry in our stores and online.

We are dedicated to meeting or exceeding all regulatory requirements related to environmental sustainability and we work closely with government entities and local communities to comply with national and local laws impacting our business. We also have programs in place to ensure that environmentally sensitive and hazardous materials are identified and managed to ensure their safe handling, movement, storage, recycling, reuse or disposal.

To learn more about our environmental sustainability efforts, we invite you to read our [Corporate Social Responsibility Report](#).



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**PETSMART**  
ANYTHING for PETS®