



# Code of Ethics and Integrity

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# A message from our CEO

**Dear PetSmart Associates,**

Each one of us is a steward of the PetSmart brand. This shared commitment and responsibility to protect our brand has made us the preferred partner to pet parents across North America.

One of the most important ways we can do right by our customers, and each other, is by living our values and ethical standards – through the everyday connections we make with pets and pet parents, as an employer, and in our supply chain and the communities where we operate.

Our Code of Ethics and Integrity, referred to as our Code, formalizes our expectations for how we do business and work together at PetSmart. Regardless of our role or where we work, we are each accountable for knowing and following our Code. It includes important guidance on PetSmart's high standards for operating with integrity and respect, understanding legal and ethical obligations, and speaking up with any concerns.

While our Code is comprehensive, it's not intended to be exhaustive. We count on you to do what is right in all that you do. If the right decision is unclear or you have a question about whether we are living up to our Code, we encourage you to let us know by using any of the Speak Up resources provided.

Together, we are helping more people experience the joy of life with pets. Amid a rapidly evolving business and retail landscape, it's this purpose that guides us forward. I thank you for your dedication to the pets and pet parents we serve and your unwavering commitment to doing what's right by them.

Sincerely,

**Ken Hicks**

President & Chief Executive Officer



# What we stand for

## *Our Vision*

Be the favorite pet retailer

## *Our Mission*

Help everyone experience more joy with pets

## *Our Values*

### **Passion for Pets**

Care  
Expertise  
Love  
Joy

### **Customer First**

Customer Focus  
Compelling Experience  
Responsive  
Proactive

### **Responsible Leadership**

Own It  
Bias for Action  
Empower  
Develop  
Communicate

### **Excellence in All We Do**

Be the Best  
Commit  
Make a Difference  
Growth Mindset  
Be Curious and Learn

### **Do What's Right**

Integrity  
Courage  
Trust  
Judgment

### **Team PetSmart**

Belonging  
Teamwork  
Grow Together  
Collaborate  
Challenge Ourselves

## **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 at PetSmart that affect our business success and the people and communities we serve. Our Code is intended to help us align our decisions and actions with PetSmart's values, policies and high business standards.

When you have a concern or face a difficult decision, our Code should be your guide. While our Code can't cover every possible situation, it provides general tools to help you make smart decisions and resources to help you find further information and support when you need it.

## ➤ Who Is Covered by Our Code?

Our Code applies to all PetSmart associates, regardless of position. Whether you work in a store, distribution center, one of the home offices or any other PetSmart facility, you are accountable for understanding and following our Code, PetSmart policies and procedures, and applicable laws.

## ➤ 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.

As a PetSmart associate, you are obligated to follow the Code and report any violations or potential violations. Failure to comply with the Code may subject you to disciplinary action up to and including termination of employment. If your actions violate the law, you could face additional legal consequences.

## ➤ 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.



## 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, 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 favorite pet retailer. PetSmart's Code is foundational to how we do business and how we put our values into practice every day. Applying our values to everything we do demonstrates our commitment to building a strong, ethical culture.

## Everyone's Responsibilities

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

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

## Additional Responsibilities of Leaders

As a leader, your actions influence others and as such you are expected to take on the following additional responsibilities:

- Serve as a role model for our culture and values
- Encourage open communications so associates can ask questions and raise concerns
- Ensure your teams understand and follow our Code and policies
- Promote an inclusive environment that welcomes and values differences
- Actively support and follow the Speak Up policy, including our prohibition on any form of retaliation
- Report and escalate incidents of misconduct or potential violations of the law or policy that are witnessed or reported



**If you hear phrases similar to those below, stop and seek support:**



*"Don't worry. No one is going to know we're doing this."*

*"Other companies do this so it must be okay."*



*"We've done this before and never gotten in trouble."*

*"We don't follow that policy."*



# 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 violating 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.** Rely on guidance from these documents to inform your decision.



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.

## Zero Tolerance for Retaliation

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

PetSmart does not tolerate retaliation against anyone who, in good faith, reports misconduct or potential misconduct, participates in an investigation or otherwise raises a concern.

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.

## 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 use one of our other Speak Up resources.

### 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)

If you are uncomfortable bringing your concerns to your leader or to other internal resources, the CareSmart Hotline allows you to make an anonymous report through a service that is operated by an independent third party.

## 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. PetSmart and all associates should use best efforts to respect privacy and the integrity of any investigation.

# Taking Care of Pets and Pet Parents

## 9 Protecting Pet Health and Safety

Creating an Excellent Customer  
Experience for Pet Parents

## 10 Providing Safe Pet Food and Products

Ensuring Our Marketing and Advertising  
Is Truthful

Protecting Customers' Privacy



# 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 made 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 your leader, or one of our other Speak Up resources.*

## 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.

## Q&A

**Q:** A pet parent brought her dog in for grooming. While performing a 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 preferred partner. Declining the service and advising the pet parent to visit a veterinarian shows that we care for the safety and well-being of her pet.



## 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 business partners.

We select product suppliers who share our commitment to safety and who have the expertise and experience to meet our high standards and expectations.

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 through 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.

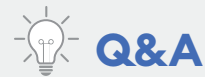


## Protecting Customers' Privacy

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.

Associates are required to protect the personal information of pet parents and follow all applicable data privacy laws and PetSmart policies for collecting, storing, using, sharing and disposing of personal information.

If you suspect that the personal information of any customer has been lost, misused, or improperly accessed or disclosed, immediately contact your leader or Information Security at [Threat@PetSmart.com](mailto:Threat@PetSmart.com).



**Q:** A fellow associate told me that when customers don't want to share their phone number to receive Treats Rewards 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 a customer's personal information in a way that is not set out in our policies and procedures. A customer's personal information includes (but is not limited to) their name, address, email address, telephone number and credit or debit card number. In these cases, you should contact your leader or make a report to Information Security at [Threat@PetSmart.com](mailto:Threat@PetSmart.com) or through one of our Speak Up resources.

# Taking Care of **Our Associates**

## **12** Maintaining a Safe Work Environment

Threats and Violence

Substance Abuse

## **13** Protecting Associates' Privacy

Recording Time Accurately

# Taking Care of Our Associates

## Maintaining a Safe Work Environment

We are committed to creating and maintaining safe work environments. You must immediately report any behavior or condition that has or could result in harm to associates, customers or others in our workplace to your leader or through one of our Speak Up resources. Associates are responsible for completing safety training applicable to their role and for following all health and safety laws and PetSmart policies and procedures related to workplace safety.

All associates have an obligation to familiarize themselves with PetSmart's emergency procedures and to report workplace incidents, injuries or emergency situations promptly. Your leader or Loss & Prevention Partner can answer questions and provide additional resources.

## Q&A

**Q:** At my store, I noticed that ladders and merchandise are sometimes left in front of emergency exits while associates stop to help customers. Is this okay since it's only for a few minutes?

**A:** No, nothing should ever be placed in front of an emergency exit – even temporarily. If you ever become aware of conditions or conduct that may threaten associate safety, immediately report it to your leader or through one of our Speak Up resources.



## Threats and Violence

We prohibit violence, threats of violence and intimidation in our workplace. You must immediately report any behavior that has or could result in harm to associates, customers, pets or others in our workplace to your leader or 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.

*For more information, refer to the Workplace Violence Prevention Policy on Fetch.*



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

## Substance Abuse

You must never work or conduct PetSmart business while under the influence of drugs or alcohol. This applies whether you are on or off PetSmart premises. The use, consumption, possession or distribution of illegal drugs in our workplace 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.

*For more information, refer to the Drug and Alcohol Free Workplace Policy on Fetch*



## Protecting Associates' Privacy

We take the responsibility of handling associate personal information seriously. We collect, use, retain and share associate information according to applicable laws and our 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).

### Q&A

**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 of 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 associate personal 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.



## 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.

Hourly associates are required to use our timekeeping system to accurately record all time worked, including time worked outside of normal schedules. Associates must not work, or permit or require others to work, off the clock, and meal and break period requirements must be followed.

Associates may only record their own time and must never record time for another associate. If you miss recording your time accurately, you must inform your leader so your time record can be corrected. If you think there is an error on your paycheck, you must inform your leader immediately so it can be addressed.

Leaders of non-exempt associates are responsible for ensuring that all time worked by associates is accurately recorded and that associates abide by our meal and break period requirements. Immediately report concerns about wage and hour issues to your leader or through one of our Speak Up resources.

*For more information, refer to the Work Hours and Work Week Policy on Fetch*

### Q&A

**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:** Our policy is clear: we never record time for another associate. Your fellow associate is responsible for recording her own time and requesting an adjustment if necessary. She should contact and work with her leader to request an adjustment.

# Respecting Each Other

**15** Belonging

Equal Opportunity

Harassment

# Respecting Each Other

## Belonging

We promote a culture of belonging and inclusion 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.

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 with courtesy and respect.

## Equal Opportunity

PetSmart is an equal opportunity employer that is committed to maintaining a culture of inclusion. We provide 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 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

PetSmart is committed to an environment that is free from harassment. We do not tolerate any behavior that diminishes the dignity of a person, or creates an intimidating, hostile or otherwise offensive environment.

Harassment is conduct 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, involve members of the same or another 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
- 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

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

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

For more information, refer to the Anti-Discrimination, Harassment and Retaliation Policy on Fetch.

## Q&A

**Q:** A post on Central Bark mentioned an associate at my store. Other associates told me that they don't like working with the 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 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 believe to be inappropriate on Central Bark, you can flag it to prompt a review. You should also report the comments to your leader through one of our Speak Up resources.

# Acting with **Integrity**

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- 18** Avoiding Conflicts of Interest
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- 24** Responding to Government Requests  
Giving Responsibly



# Acting with Integrity

## External Communications

### Communicating Responsibly

Communicating responsibly with our customers, associates, and external stakeholders maintains the trust those groups have in us. We must ensure we provide accurate and consistent information to external audiences. Always refer inquiries to the appropriate resources and remember:

- Only authorized associates may communicate to the public on PetSmart's behalf. You should not answer questions from the media on behalf of PetSmart without prior approval.
- Secure approval from the Corporate Communications Department before permitting a third party to use our logo or agreeing to participate at a speaking engagement where PetSmart will be discussed or referenced.
- Never lobby, or hire a third party to lobby, the government on PetSmart's behalf without approval from the Chief Legal Officer. "Lobbying" includes attempting to influence the decisions of government or a government official.
- Always refer inquiries directed to PetSmart from any government entity to the Legal Department.

### Media Inquiries

If you are contacted by anyone requesting in-store photography, TV coverage, a public interview, participation at an industry conference 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.

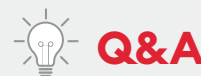
## Social Media

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.

When using social media:

- Do not speak on behalf of the company unless authorized; always make clear that any opinions expressed are your own
- Never reveal confidential PetSmart information, including financial information or information about customers or associates
- Never engage in harassing behavior or make defamatory or discriminatory statements
- If you make comments on our brand, product or services, you must disclose your connection to PetSmart
- Respect trademark, copyright and other associated laws.

*For more information, refer to the Social Media Policy on Fetch.*



**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 discount has been communicated to the public, you may share it on social media if you include a statement indicating that you work at PetSmart.



## 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.

You must avoid a conflict, or an appearance of a conflict, between your personal interests and PetSmart's interest. Even the appearance of a conflict of interest can damage trust with our customers, business partners and associates.

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.

*For more information, refer to the Conflict of Interest Policy on Fetch.*

## Outside Employment and Business Interests

Associates must avoid outside employment or business interests that could negatively affect job performance or interfere, or appear to interfere, with the ability to make decisions in the best interest of PetSmart. Associates are generally not permitted to work for or provide services to a competitor or business partner of PetSmart. Any exceptions must be approved by Human Resources and the Legal Department.

### Q&A

**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 outside of PetSmart while employed by PetSmart could constitute a conflict of interest. Before pursuing outside business opportunities, contact Human Resources.

## 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 interests 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.

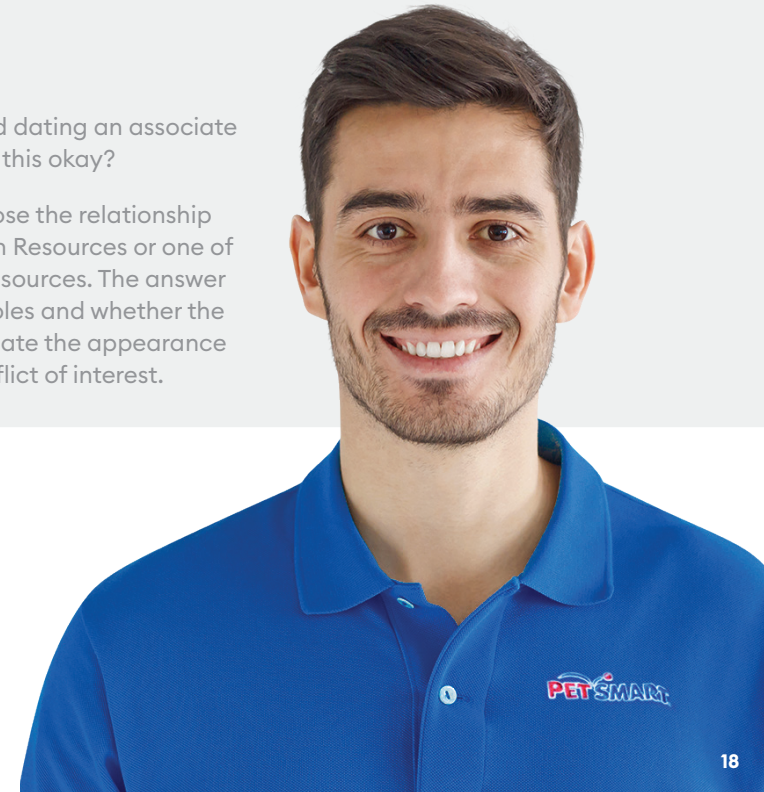
If an associate with whom you already have a romantic or personal relationship comes under your supervision due to a position change, immediately disclose the relationship to Human Resources and your leader.

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

### Q&A

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

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



## Supplier Relationships

Before participating in the selection of a supplier or other business partner which employs a family member, personal friend or romantic partner, you must disclose the relationship to Human Resources and the Legal Department so that these teams can provide guidance based on the unique facts and circumstances of the situation.

### Q&A

**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:** As a general rule, you may not engage your brother's company to provide services to PetSmart. You should disclose the potential conflict of interest to your leader, Human Resources, and the Legal Department. They will evaluate whether steps can be taken to remove your involvement in the decision making process and ensure that decisions are made in the best interests of PetSmart.

## Gifts and Entertainment

Exchanging gifts or sharing meals and entertainment with our suppliers and business partners is one way to strengthen professional relationships. However, these exchanges can be inappropriate, and in some cases illegal if they are intended to influence or appear to influence a business decision. 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.

To ensure that business courtesies do not influence or appear to influence our business decisions or the business decisions of others, associates must comply with the Company's Gifts and Entertainment Policy and with the Anti-Corruption Policy, which set forth additional restrictions and requirements.

*For more information, refer to the Gifts and Entertainment Policy on Fetch.*

### Q&A

**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 your leader or through one of our Speak Up resources. When in doubt, it's always best to decline the invitation.

## 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 or 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 advantage of a business opportunity that belongs to PetSmart and you may not share a business opportunity outside of PetSmart without the prior approval of Human Resources and the Legal Department.

*For more information, refer to the Conflict of Interest Policy 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 and other information 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 any document or communication maintained in the course of business, such as financial records, contracts, project plans, purchase orders or emails. You are responsible for ensuring that the records in your custody or control are maintained, retained, and destroyed in compliance with our retention policies and all legal and regulatory record keeping requirements. To manage your business records properly, you should:

- Comply with our records management policies and retention schedules for all business records
- Never falsify a business record, report misleading information or hide, alter or disguise any business transaction
- If you receive a legal hold or tax audit notice, follow all retention instructions on the notice regardless of the retention schedule or applicable law

If you have questions about a legal hold or tax audit notice, consult the Legal Department.

*For more information, refer to our Enterprise Records Retention Schedule on Fetch.*

### Insider Trading

While working for PetSmart, you may be exposed to material, non-public information about PetSmart or one of our business partners. “Material, non-public information” is information that is neither public nor widely disseminated and that a reasonable investor would think is important in making a trading decision such as sales and earnings figures or information regarding a significant merger or acquisition or change in business strategy.

We must never engage in insider trading – the illegal buying or selling of securities using any material, non-public information. We also must never provide material, non-public information to others so that they might trade on such information – this is known as “tipping” and is also illegal.

### Avoiding Corruption and Bribery

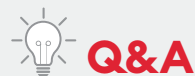
PetSmart prohibits any form of corruption in our business dealings and will not compromise our integrity or reputation to achieve a business goal. We comply with anti-bribery laws and no associate, person or company working on PetSmart’s behalf may authorize, offer or pay a bribe.

A bribe is anything of value offered or accepted, directly or indirectly, to influence decision-making, retain business or secure an unfair business advantage. In addition to cash, bribes can also be gifts, hospitality (travel, meals and entertainment), donations and sponsorships, or anything else that could be valuable to a recipient. A bribe can also come in the form of a “facilitating payment,” which is a payment made to a government official with the intention of expediting an administrative process.

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.

In some cases, requests for bribes may be disguised or may be considered customary. We have a policy to help you identify red flags. You must promptly report any suspected bribery, demands for a bribe, or the actual payment of a bribe to your leader, the Legal Department or through our Speak Up resources. When in doubt, or if you have questions, you should contact the Legal Department.

*For more information, refer to the Anti-Corruption Policy on Fetch.*



**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.





## 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
- Boycott another company

If any of these topics come up while you're interacting with a vendor, competitor or other 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, so please contact the Legal Department if you have any questions or need to report any concerns.

*For more information, refer to the Antitrust Policy on Fetch.*

### Q&A

**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 some 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.

## Preventing Money Laundering

Money laundering is an illegal activity where individuals or organizations attempt to make money from criminal activity appear legitimate by funneling it through legitimate business transactions.

Associates should be on alert for transactions that might signal this type of activity. From a business partner, a red flag could be a request to make payments in cash, from a nonbusiness account, or via other unusual payment terms. From a customer, a red flag could be unusual purchases or use of gift cards. Gift cards are increasingly being used by criminals to launder money because they can be purchased and used without identifying an individual.



### Q&A

**Q:** A customer came to my register and purchased a large number of gift cards with cash. A few minutes later a different customer purchased even more gift cards with cash. I didn't think much of it, but I noticed the same customers returning to purchase more gift cards with cash and sometimes asking that the purchases be separated into multiple transactions. Is there something I should do?

**A:** The way these customers are purchasing the gift cards suggests that they might be engaging in money laundering activities. Continue following any register prompts that occur during the sale of gift cards and report your concerns to your leader or through one of our Speak Up resources.



## Following International Trade Laws

Some of the products we source, sell or use are bought from or sold to foreign partners. PetSmart is subject to complex laws that govern imports and exports. If your role involves duties related to importing or exporting any products you must follow all applicable laws and company policies regarding international trade.

Our business transactions are subject to various global trade controls and sanctions that we must abide by, which include but are not limited to:

- Government-imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts
- Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved or sanctioned by the U.S. government
- Sanctions by the U.S. or other governments that restrict activities with certain countries, entities or individuals



*If you have reason to believe that a business partner is violating an applicable trade law, behaving unethically or violating PetSmart's commitments, report your concern to the Legal Department.*

## Protecting PetSmart Resources

### PetSmart Confidential and Proprietary Information

Company confidential information, including financial and operational data, customer and associate information, employment records and business plans are all valuable assets that belong to PetSmart. Each of us is responsible for protecting PetSmart's confidential information from unauthorized disclosure. You must safeguard confidential information by following all applicable policies and procedures, including all information security measures, and by being careful and prudent when you access, use, store or transfer such 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. Further, associates should only share confidential information within PetSmart on a need-to-know basis. 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 report it to your leader or through one of our Speak Up Resources.



**Q:** I travel frequently in my role at PetSmart and sometimes 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 PetSmart 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.

### PetSmart Intellectual Property

We all share a responsibility to protect PetSmart's intellectual property assets and must follow all policies and procedures for developing, using, 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, software and business innovations. As a company employee, any work you create (in whole or in part) in connection with your duties belongs to PetSmart.

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

PetSmart's business assets must be used only for appropriate business purposes and be protected from theft and abuse. 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).

You are responsible for protecting PetSmart's business assets and ensuring their efficient use for legitimate purposes only. You must report theft, attempted theft, property damage and inappropriate use of PetSmart business 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.

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.

### Associate Discount Policy

PetSmart provides a discount as a benefit to its associates. You are responsible for understanding and complying with the terms of our Associate Discount Policy. Letting anyone else use your discount, or being reimbursed for purchases for others, is contrary to our policy.

*For more information, refer to the Associate Discount Policy on Fetch.*



## Responding to Government Requests

PetSmart cooperates with reasonable requests for information from government agencies. If a government authority contacts you with a request for business information, you must immediately notify a member of the Legal Department who can assist with the inquiry.

We are always honest with government agencies, but it is important that only designated PetSmart associates handle these requests.

*For more information, refer to the Enterprise Legal Papers Policy on Fetch.*

## 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 six values inspire many of us to enrich our communities by supporting organizations and causes with our time, talent and dollars. We encourage you to give back to your communities by participating in company outreach efforts, volunteerism and other ways that are meaningful to you.

*For more information, refer to the Volunteering Policy on Fetch.*





# Supporting Our Communities

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# Supporting Our Communities

## Respecting Human Rights

PetSmart recognizes the importance of maintaining and promoting fundamental human rights in our operations and supply chain.

We select and work only with suppliers and business partners who share our values and demonstrate an ongoing commitment to human rights. Our Supplier Code of Conduct communicates our requirements and expectations for our supply chain partners. The requirements include, but are not limited to, the following:

- Promote a workplace free of discrimination and harassment
- Prohibit child labor, forced or involuntary labor and human trafficking
- Comply with all applicable labor and employment laws, including those governing working hours, fair and equitable wages and health and safety
- Recognize and respect applicable laws that address freedom of association



*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.*



**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 take or initiatives we support are consistent with our values. All decisions regarding PetSmart's position on a political issue or a political contribution may only be made with the approval of the Chief Legal Officer.

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, you must 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 head of Corporate Communications and the Chief Legal Officer.



**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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