



# Code of Ethics & Conduct

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**Our Vision:**  
**Healthier pets. Happier People. Better World.**

**Our Mission:**  
**We obsess about delivering health and happy experiences for pets and the people who love them.**

In support of our vision and mission, Petco has five core values that guide and serve as a foundation for our culture and Code of Ethics & Conduct. This guide helps Partners understand our Code and values to ensure we live and practice them each and every day.

## Do What's Right

We earn the trust of our guests, partners, suppliers and shareholders through sincerity, reliability, competence and our commitment to ethical business practices and conduct. Our relentless passion for improving the lives of animals should guide every decision we make.

It is the policy of Petco Animal Supplies Stores, Inc., its affiliates and subsidiaries ("Petco" or "the Company") to conduct business in accordance with a strict and specific Code of Ethics & Conduct. All Board members, officers, managers and Partners are expected to adhere to high ethical and legal standards and to avoid any actual impropriety or appearance of impropriety.

**To this end, all Petco Partners are expected to comply with all applicable laws and regulations and with Petco's Policies & Procedures including, but not limited to, those discussed in this Code of Ethics & Conduct. Petco does not tolerate retaliation against any Partner who raises concerns or questions regarding a potential violation of the Code of Ethics & Conduct that the Partner reasonably believes to have occurred.**

Sometimes it is difficult to Do What's Right. The following are some questions you should ask yourself when deciding if you made (or are making) the right decision. If you can answer "Yes" to all of the following questions, then your decision is probably a good one. If you answer "No" or "I don't know" to any one of these questions, seek guidance from your manager.

- Will my actions comply with the law and with Petco's Policies & Procedures?
- Will others view my actions as fair and honest?
- Will I feel good about my decision afterward?

- Would my manager, other Partners, customers, family and the general public approve of my actions?
- Would I feel comfortable reading about it in the newspaper?

## Responsibility of officers and management

Petco's management team plays a key part in enforcing the Code of Ethics & Conduct and acting as role models. Specifically, if you are in a management role, you should:

- Maintain the highest level of honesty and personal integrity in your daily responsibilities
- Make ethical employment decisions in recruitment advertising, hiring, placement, promotion, transfer, layoff, demotion, separation, training, pay and other aspects of employment
- Ensure that Partners are aware of—and acknowledge—the Code of Ethics & Conduct
- Recognize signs of unethical conduct and take appropriate steps in response to violations

When a Partner has an ethics or compliance concern, they are encouraged to first seek assistance from their manager. This means that managers are responsible for responding to such concerns in a complete and timely manner. See the **“Have a Question or Concern?”** section of this code for additional reporting alternatives.

## Condition of employment

All Partners must accept and adhere to this Code of Ethics & Conduct and all related Petco Policies & Procedures (“P&P”) as a condition of employment with Petco. Failure to accept or adhere to this Code of Ethics & Conduct and the corresponding Policies & Procedures may result in disciplinary action, up to and including separation from employment.

## At-Will employment

This Code of Ethics & Conduct and the matters contained herein are neither a contract of employment nor a guarantee of continued employment. Unless there is a written contract signed by the CEO, all employment at Petco is at-will. That means that either the Partner or Petco can end the employment relationship at any time, with or without cause, and with or without notice. Other than the policy of at-will employment, we reserve the right to amend, supplement or discontinue the Code of Ethics & Conduct and the matters addressed herein without prior notice, at any time.

## Internal Audit

Our Internal Audit Department provides independent, objective assurance and advisory services to management and the Audit Committee to help Petco accomplish strategic initiatives by bringing a systematic, disciplined approach to evaluating and improving the effectiveness of the governance, risk management and internal control processes.

# We are a Pet Company

Petco is more than a pet store, and we must live up to our name. We are a pet company and everything we do is guided by our vision for healthier pets, happier people and a better world. Petco believes it is important to hire passionate animal advocates and build their skills and knowledge in order to successfully **achieve our vision**.

Whether you're caring for animals, educating prospective pet parents or promoting Petco's Think Adoption First® philosophy, your everyday decisions make all the difference in achieving Petco's high ethical standards regarding animal care. The following paragraphs summarize the fundamental philosophies Petco has adopted regarding animal care that all Partners are expected to understand, support and uphold.

## Animal Care

As Petco Partners, it is our responsibility to promote the health, well-being and humane treatment of animals. We must do the right thing as a Company and as individuals to ensure animal well-being without jeopardizing human safety. We must consistently deliver safe, skillful and compassionate care to all animals entrusted to us. While animals are in our care, Partners constantly monitor their health and well-being, beginning with regular checks during business hours conducted according to guidelines created by experts. These checks are supplemented by further reviews and audits by regional and support center personnel.

Whenever you walk down the aisles of a Petco store, whether you are on duty or shopping for your pet, take a moment to verify that all animals are properly fed, watered and housed. If you believe the care of an animal may be in question, it is your responsibility to take the initiative to communicate your concern and make sure that appropriate action is immediately taken to resolve the concern.

Petco Partners must share and support Petco's animal care objectives and demonstrate genuine respect and concern for animals and their proper care. Any Partner who engages in behavior constituting neglect, mistreatment, cruelty or abuse of any animal will be subject to immediate discipline, up to and including separation from employment. This includes neglect, mistreatment, cruelty or abuse of any animal on or off Petco premises, including animals offered for adoption or sale; those visiting Petco for grooming, photographs, veterinary care or obedience training and those that are on Company premises for any other reason. Where appropriate, Petco may refer such matters for criminal prosecution. [For more information about animals and their care, please review the related Policies & Procedures on PetNet.](#)

## Petco partnerships

Petco partners with thousands of non-profit and municipal animal welfare organizations to promote the humane treatment and adoption of animals. We are a strong supporter of groups that demonstrate advocacy for animals, consistent with Petco's animal care philosophies.

Petco maintains an independent Veterinary and Animal Care Advisory Council, a group of experts in veterinary medicine, animal behavior, animal welfare and animal ethics. The Council provides expert input on Petco products, services, animal care policies and protocols.

Petco believes that the mission of quality animal care is a never-ending process and we are dedicated to continually advancing industry standards in collaboration with experts in the field. Accordingly, with the Council's input, we routinely review our Policies & Procedures to promote the best possible care for the animals in our stores and the communities we serve.

Consistent with our commitment to the health, well-being and humane treatment of animals, Petco has relationships with local veterinarians across the country to ensure that each store has a veterinarian to provide necessary animal care. Any animal that is sick or injured must be isolated from other animals for treatment by the store's veterinarian as soon as possible.

It is Petco's belief that all animals have intrinsic value and euthanasia is only pursued on the recommendation of the veterinarian overseeing the care of the animal. It is also Petco's policy that euthanasia only be performed to alleviate pain and suffering due to a medical condition, not due to the cost of a medical procedure or the monetary value of an animal. [For more information about Animal Adoptions and Veterinary Partnerships, please review the related Policies & Procedures on PetNet.](#)

## **Petco Foundation**

Since its founding in 1965, Petco has promoted a "think adoption first" philosophy. This philosophy has allowed Petco to become productive partners with the many humane groups that we partner with nationwide. The Petco Foundation was established in 1999 to allow Petco to promote charitable, educational and other philanthropic activities for the betterment of animals everywhere.

The Petco Foundation's mission is to "save lives by enhancing the quality of life for animals and the people who love and need them." The Foundation achieves this by fundraising and allocating support for thousands of animal welfare programs and organizations focused on lifesaving work in local communities throughout the country.

All Partners participating in Petco Foundation fundraising efforts must abide by related policies to maintain the respect and trust of the general public. All fundraising efforts must be conducted according to the rules and guidelines published by the Petco Foundation. [For more information about the Petco Foundation Fundraisers and Support, please review the related Policies & Procedures on PetNet.](#)

## **Vendor Certification & Standards of Excellence Program**

All Petco live animal vendors are required to participate in the Petco Vendor Certification and Standards of Excellence Program. All vendors in this program are inspected and must pass a rigorous certification

process. Partners who audit and certify vendors for this program adhere to the highest level of diligence during the inspection process. Petco's commitment to working with the vendor community extends beyond certification to include collaborative efforts—such as improving the animal transportation process with the goal of reducing animal stress during transport. [For more information about Live Companion Animal Vendor Audits, please review the related Policies & Procedures on PetNet.](#)

## Customer First, Always.

Petco creates a fun and exciting shopping experience for customers and their pets by offering a complete, competitively priced selection of pet products and services with superior customer service at convenient locations.

### Customer privacy

Petco's customers trust us to handle their personal information with the utmost care and respect and to protect it from misuse or unauthorized disclosure. At Petco, we take this responsibility seriously and expect Partners to comply with the administrative, technical and physical safeguards Petco has implemented to protect this information. Customer information includes name, address (physical and email), phone number, credit/debit card information, other identification information, buying history and communications received from the customer, including complaints. Customer information is classified as "confidential" under the four-tier information classification system adopted by Petco.

Partners may never use customer information for personal reasons or for any other purpose than the one for which the customer provided the information. Partners are required to immediately report any suspected or actual failure to protect customer information to a manager, the Chief Information Security Officer (via email to [CISO@petco.com](mailto:CISO@petco.com)) or the **Petco Hotline** at **1.888.736.9834**. [For more information about Petco's Information Systems and Security Program, please review the related Policies & Procedures on PetNet.](#)

### Our selling practices

Petco maintains its reputation as a pet-loving company by providing guidance to our customers that is in the best interest of the animals. We interact ethically with each customer and clearly explain the purpose and benefits of our products and services. Each Partner should be knowledgeable about the products and services to help customers make sound decisions that best fit their needs. When unsure of the answer to a customer's question, Partners should seek help from another knowledgeable Partner or a member of management. If customers have concerns, our dedicated Customer Relations team can be reached at [CustomerRelations@petco.com](mailto:CustomerRelations@petco.com) or 1.888-824-7257.

## Our advertising practices

Our advertising activities should always be true and accurate. Advertisements should be clear and cannot be deceptive or misleading. Petco advertising should comply with the law in areas including, but not limited to, product information, pricing, comparative pricing, product availability and warranty statements.

## Unite and Conquer

Petco believes innovation happens through collaboration between a diverse team of wildly talented people fueled by knowledge, curiosity and a get it done attitude. Petco can only achieve this through respecting ourselves and each other.

## Environmental sustainability

At Petco, minimizing our impact on the environment is a responsibility we take seriously – and we believe that if it's good for the planet, it's good for pets too. Petco is committed to complying with applicable environmental laws and regulations. Our Partners are expected to use all resources appropriately and efficiently and make every effort possible to protect our environment. Petco believes that it is our duty to take an active role in building a better world. [For more information about our environmental sustainability program, please see the Operations Manual and/or the Safety department page on PetNet.](#)

## Workplace safety

Petco is deeply committed to the safety of its Partners and customers and to providing them with a safe and healthy environment. Petco's policy is to comply with all federal and state safety laws and regulations, all applicable OSHA requirements and Petco's Safety Policies & Procedures.

A key aspect of the Petco Safety Program is for Partners to take responsibility for their own safety and the safety of their fellow Partners. Partners should be conscientious about workplace safety, including proper operating methods and known dangerous conditions or hazards. Partners should immediately report any unsafe conditions or potential hazards to their normal chain of command, even if you believe you have corrected the problem. If that does not resolve the issue, then please see the **"Have a Question or Concern?"** section of this code for additional reporting alternatives. [For more information about workplace safety, please review the related Policies & Procedures on PetNet.](#)

## Harassment and discrimination

Petco is committed to providing a workplace that is free of harassment of any kind as well as unlawful discrimination. Harassment includes any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive or hostile work environment. It can take many forms, such as: physical actions. Sexual harassment can include unwelcome sexual advances, requests for sexual favors or any other conduct of a sexual nature.

Petco is an equal employment opportunity employer and will not tolerate harassment or discrimination of any sort and especially harassment or discrimination based on gender, age, race, color, creed, religion, national origin, physical or mental disability, medical condition, marital status, pregnancy, sexual orientation, veteran status, or any other trait or characteristic protected by law. Partners should immediately report any harassment or discrimination concerns to their normal chain of command or refer to the **“Have a Question or Concern?”** section of this code for additional reporting alternatives. [For more information about harassment and workplace conduct, please review the related Policies & Procedures on PetNet.](#)

## Violence in the workplace

Petco is committed to providing a workplace that is free of acts and threats of violence. Our Policies & Procedures aim to increase Partner, vendor and customer protection with a goal of providing everyone with a safe and healthy working environment. [For more information about Petco's policy against violence in the workplace, please review the related Policies & Procedures on PetNet.](#)

## Drug & Alcohol Policy

Petco enforces a strict drug and alcohol policy to ensure the utmost protection of our Partners, pets, and pet parents. Partners must not report for work or conduct company business while impaired of alcohol, drugs, or misused prescription medication. Possession or consumption of such substances is prohibited while on Petco property, on duty at a Petco location, representing Petco in other capacities, and when operating company-owned equipment. [For more information about Petco's policy against drug and alcohol abuse, please review the related Policies & Procedures on PetNet.](#)

# Stay Forward

Strive to be an agent of change when the idea or opportunity is right, and never let fear of failure slow you down. Be humble, stay driven, relentlessly improve and always be part of the solution. Seek guidance, ask questions and report concerns whenever you are unclear or unsure of what to do.

## Conflicts of interest

Partners are required to arrange outside obligations, financial interests and other activities so as not to conflict with their professional commitments to Petco. It is important to note that the mere appearance of a conflict can be as serious and potentially damaging as an actual conflict. Therefore, Partners are expected to avoid both actual and apparent conflicts. A “conflict of interest” occurs when a Partner’s own personal interests interfere—or appear to interfere—with his or her ability to make sound, objective business decisions on behalf of the Company.

If you have knowledge or a question about a possible conflict of interest, you should disclose it immediately to your normal chain of command or refer to the **“Have a Question or Concern?”** section of this code for

additional reporting alternatives. Petco reserves the right to take whatever action it determines to be appropriate to eliminate the actual, apparent or potential conflict, up to and including separation from employment.

### **Accepting and giving gifts, favors or entertainment**

Business gifts and entertainment can build corporate goodwill between our Company and those with whom we do business, but should not be used to improperly influence business decisions. You may not accept a business gift or entertainment in certain situations or depending on the value of the gift. You should also be aware that the same standards apply when giving gifts. Certain third-party-paid training, business-related travel, events, sporting events or conferences may be appropriate, but only with the prior approval of an officer (VP or above). Partners may keep handouts, promotional items or other prizes that are given away during approved events as long as such event comply with Petco's Gift/Gratuity Policy. Partners who receive a prohibited gift should tell their manager and return the gift. [For more information about Petco's Gift/Gratuity Policy, please review the related Policies & Procedures on PetNet.](#)

### **Employment with others**

Partners are expected to exercise discretion in pursuing employment with suppliers, vendors, competitors or others doing business with Petco. If you are considering pursuing such a position, discuss your career plans with your manager or Human Resources representative prior to taking any action.

### **Investing in vendors or competitors**

No Partner or immediate family member shall knowingly directly or indirectly invest in, lend money to or borrow money from any company with whom Petco does business or directly competes without prior approval from their manager. Partners must report any current investments and/or loans with vendors or competitors to their manager, who, together with the Partner, will make decisions regarding disposal of such investments. Partners are prohibited from having a financial interest in any business in which the Partner has influence upon Petco's relationship with that business. For the purposes of this section, the term "invest" or "investment" includes any investment personally owned or beneficially owned by family members, family trusts, nominees or others where the effect is that the individual Partner derives any benefit from such investment.

### **Workplace relationships (fraternization)**

Petco discourages romantic or sexual relationships between co-workers and strictly prohibits such relationships between managers and anyone they directly or indirectly supervise or who is in their chain of command. [For more information about harassment & workplace conduct, please review the related Policies & Procedures on PetNet.](#)

## Outside interests

It is not the intention of Petco to restrict any Partner from any legal activity outside the workplace, such as political, religious, non-profit or community work, as long as it in no way conflicts with or reflects adversely on Petco. Such activities are not to be endorsed, funded or sponsored by the Company, and must not be represented as such, either explicitly or implicitly, without prior approval from Human Resources.

## Social media and social networking

Petco encourages Partners to participate in online conversations and to share their knowledge and expertise, but it must be responsible, respectful and in accordance with relevant laws and regulations. Partners should be aware that their postings, even if done off-premises and while off-duty, could adversely affect Petco's legitimate business interests.

Petco prohibits the use of social media to post or display comments about co-workers, Petco or Petco's customers that are vulgar, obscene, threatening, intimidating, harassing or a violation of Petco's workplace policies against discrimination, harassment or hostility on account of gender, age, race, color, creed, religion, national origin, physical or mental disability, medical condition, marital status, pregnancy, sexual orientation, veteran status, or any other trait or characteristic protected by law. [For more information about Petco's social media and social networking policy, please review the related Policies & Procedures on PetNet.](#)

## Responding to media inquiries

Only designated Petco Partners may speak for or on behalf of the company. If contacted, you should direct the media to the **Petco Press Line** at **1.858.909.4665**.

## Post-separation Partner responsibilities

During your employment with Petco, you receive — and will receive — compensation and training that is valuable to you and your career. In exchange for that compensation and training, all Petco Partners agree to protect Petco's confidential and valuable trade secrets and other protectable information.

Specifically, your responsibilities are as follows: 1) At all times during and after employment with Petco, you may not disclose any confidential Petco information or trade secret; 2) At no time during or after your employment with Petco may you utilize any Petco confidential or trade secret information to compete with Petco and 3) During your employment, and for 12 months immediately after the ending of your employment with Petco (regardless of the reason), you may not encourage or ask any other Petco Partner to leave his or her employment with Petco.

Unless you have a specific contract restricting competition with Petco, you may compete with Petco following your separation. However, you may not use confidential or trade secret information to compete with Petco or engage in acts that would constitute unfair competition, or disclose or use trade secrets or

other proprietary information. [For more information regarding Petco's confidentiality policies and practices, please see the related Policies & Procedures on PetNet and or speak with your manager.](#)

## Protecting assets/privacy

### Accurate records

Petco is committed to our financial controls and accurate reporting. All assets, liabilities, expenses and other transactions shall be recorded in a timely manner for the correct amounts. Financial statements should not be misleading in any way. No undisclosed or unrecorded fund or asset of Petco and its subsidiaries shall be established or maintained for any purpose. Petco uses many internal measures to track business performance. It is imperative that these measures accurately reflect how our business is actually doing.

### Safeguarding business information

Information security is an important issue because technological changes have made it very easy to share information—even when it should not be shared. Improper use of information can have a wide range of negative effects, such as damage to Petco's brand or reputation, financial losses or exposure to regulatory penalties. Petco's Information Security Program (ISP) includes specific administrative, technical and physical safeguards designed to secure its sensitive business information. As part of that program, Petco has adopted a four-tier system for classifying business information:

- **Secret Information**—used in extremely sensitive business processes; access is extremely limited and tightly controlled. For example, Secret Information includes, but is not limited to, documents used in mergers, acquisitions, strategic plans, research and development, litigation and other extremely sensitive matters.
- **Confidential Information**—access is highly controlled and limited to specific groups of individuals, job functions, or departments within Petco. For example, Confidential Information includes, but is not limited to, customer information, Partner information, sales information, budget data, forecasts, store listings, construction reports, open/close store reports, and real estate pending transaction lists.
- **Internal Information**—access is moderately controlled and limited to individuals within Petco with a legitimate business need for the information. For example, Internal Information includes, but is not limited to, building blueprints, customer/vendor contracts, company phone lists, internal policies, procedures, memos, forms, meeting minutes, organizational charts and any other general business information that is not specifically labeled as Secret, Confidential or Public.
- **Public Information**—information is available to the general public and intended for distribution outside of the organization. Public Information includes, but is not limited to, product, sales and marketing literature, job announcements, press releases and published weekly advertisements.

A good information handling practice to adopt is to only share information on a “need-to-know” basis and to always know the classification of the information you receive. Additionally, if you ever have a question about the classification of the information you receive or about the correct use of that information, ask your manager for direction or contact the Chief Information Security Officer (via email at [InfoSec@petco.com](mailto:InfoSec@petco.com)).

## Safeguarding Partner privacy

It is our policy to take all reasonable steps to protect our Partners’ personal information. Petco complies with all laws that protect the privacy of our employees’ personal information. If your job requires you to have access to other Partners’ private information, you must take all reasonable steps to protect the privacy of that information. Petco may need to search your computer, locker, desk drawer and other areas. You should have no expectation of privacy of information created, stored or kept at work.

## Utilizing IT resources

Partners utilize IT resources to serve our customers, Partners and stakeholders. All Partners with access to company-owned IT assets, including computers, email, mobile phones, software and storage, must follow all relevant policies and procedures. Partners are directly responsible for the proper care, maintenance and usage of the hardware.

Email messages and other electronic records may be accessed and read by authorized personnel and sometimes by persons outside of Petco. File cabinets, desk drawers, Petco vehicles, lockers or any other storage devices, including your computer and company issued cell phone, or tablet are the property of Petco and subject to inspection by management at any time. In addition, company material created and/or stored on personally-owned devices is potentially subject to review by Petco. [For more information about information systems policies, including asset management, internet use, and acceptable use of email, please review the related Policies & Procedures on PetNet.](#)

## Loss prevention

Protecting Petco’s assets is every Partner’s responsibility. We should take great care to protect these assets from loss, damage, theft, misuse and waste. Loss of assets may be caused by many factors, including:

- Theft of merchandise, supplies or funds
- Fraudulent use of customer or Partner information (including, but not limited to, credit/debit card, benefits or insurance information)
- Errors in paperwork, either intentional or not; or careless damage to or destruction of goods or property

If you become aware of any potential loss to Petco, you have any obligation to report it to your normal chain of command or refer to the “**Have a Question or Concern?**” section of this code for additional reporting alternatives.

# Complying with the law

All Petco Partners shall conduct their business affairs in accordance with all applicable laws of the United States and other governmental jurisdictions in which the Company does business.

## Wage and hour laws

Petco is committed to adhering to applicable federal, state and local wage and hour laws, including those related to minimum wage, overtime wage, child labor and other wage and hour laws and regulations. Partners are expected to report any wage and hour violations immediately to their normal chain of command or see the **“Have a Question or Concern?”** section of this code for additional reporting alternatives. All Partners are responsible for maintaining and reporting (when required) an accurate accounting of all hours worked. It is illegal and against Petco policy to allow or require any Partner to work “off the clock” or falsify hours worked. [For more information about work time and work scheduling, please review the related Policies & Procedures on PetNet.](#)

## Duty to report and cooperate with investigations

Every Partner has a duty to report potential or apparent violations of the Code of Ethics & Conduct or Policies & Procedures. Further, every Partner is obligated to fully cooperate in any investigation by Petco regarding a reported concern and cooperate in the legal representation and defense of the Company’s interests by the Legal Department.

## Government agencies

Petco may be contacted by government agencies inquiring about our business. When requested, Petco will provide information to the agency that is appropriate, lawfully requested and relevant to the inquiry of the agency. Partners who are contacted by a government agency representative should request to see appropriate identification, immediately notify their manager of the visit and seek direction from their manager and the support centers about how to comply with requests from the agency before releasing any requested data. Finally, all locations must report such contacts to the support centers by submitting a Regulatory Compliance Report (“RCR”) using the related tool found on PetNet. [For more information about reporting regulatory agency visits or handling of legal notices, please review the related Policies & Procedures on PetNet.](#)

## Political contributions

No Petco funds or services shall be paid or furnished to any political party or any candidate for, or incumbent in, any public office, regardless of whether the contributions are legal under the law of the state or country in which they are made.

## Insider trading

Material non-public information (insider information) is information about a company that is not known to the general public and that could influence an investor's decision to buy, sell or hold that company's securities. Petco Partners must not help others obtain a financial advantage by using insider information. This prohibited activity is known as insider trading. Insider trading is not only a violation of the Code, but also a serious violation of U.S. securities laws and will expose any individuals involved to immediate termination, as well as potential civil and criminal prosecution.

## Antitrust

Petco is committed to complying with all antitrust and trade regulation laws. The purpose of these laws is to promote free and open competition by prohibiting business practices that may lessen competition. We must avoid even the appearance of agreeing with a competitor to limit how we compete with one another. Petco will not tolerate any business transaction or activity involving Partners, consultants, contract workers or temporary staff that violates the antitrust and competition laws or regulations of any country or region in which Petco conducts business.

## Foreign Corrupt Practices Act (FCPA)

It is Petco's policy that all Partners, independent contractors, agents, representatives, vendors and other third-parties who work with Petco fully comply with the anti-bribery laws of the United States and of the foreign countries where Petco does business. Bribery of any kind in the United States and abroad, regardless of foreign customer or practice, is strictly prohibited. [For more information about Foreign Corrupt Practices Act, please visit the www.SEC.gov or view Petco's policy on the Foreign Corrupt Practices Act \(FCPA\) found on PetNet.](#)

## International Trade Regulations

Petco obeys all laws and regulations that govern international trade and U.S. Customs. Some of the products sold and used in Petco facilities are imported into the U.S. from foreign countries, which means that Petco vendors must also comply with these laws. In order to maintain Petco's high standard of ethics, it is important that Partners and vendors are knowledgeable of the various requirements under international trade and U.S. Customs laws. [For more information on these requirements, please view the Import Compliance Manual on PetNet under Forms & Docs.](#)

# Have a Question or Concern?

## What to do when you have an ethics or compliance concern or question?

Partners should feel free to ask questions about what is right or wrong without fear of retaliation. Partners who are challenged with a tough ethical question or are not sure about how to proceed are encouraged to resolve those issues through their normal chain of command. This means Partners should first seek assistance from their manager. Partners who are not comfortable seeking assistance from their manager or feel they are not receiving adequate assistance should seek assistance from the person above their supervisor. Partners who are not comfortable working through their normal chain of command or feel they are not receiving adequate assistance should see below for reporting alternatives.

## Reporting ethics or compliance violations

Petco has established alternative reporting options for Partners to report ethics or compliance concerns that they are not able to resolve through their normal chain of command:



**1.888.736.9834 | [www.PetcoHotline.com](http://www.PetcoHotline.com) | [Ethics@petco.com](mailto:Ethics@petco.com)**

- Employee Relations Department: [EmployeeRelations@petco.com](mailto:EmployeeRelations@petco.com)
- Legal Department: [Law@petco.com](mailto:Law@petco.com)

The Petco Hotline is answered by a third-party and is confidential and available 24 hours a day, seven days a week. Calls to the Petco Hotline can be anonymous. Petco understands that a Partner may prefer to report concerns anonymously; however, complete details are usually needed to thoroughly investigate matters and enable Petco to reach the correct resolution. Therefore, Petco encourages Partners to identify themselves when voicing their concerns without fear of retaliation.

## What happens when you report an ethics or compliance concern?

Petco is committed to fully investigating all reported ethics and compliance concerns and appreciates when Partners bring such concerns to our attention. When making a report, Partners are encouraged to provide as many specific details as possible, because doing so will assist us in conducting a complete and timely investigation. When a report is received, it is immediately assigned to a case manager with expertise relating to the reported concern.

Ethics and Compliance investigations typically take at least two weeks to complete and may take longer. Petco will try to complete each investigation as quickly as possible. It is important to remember that many times, the specific results of an investigation will not be made public. All reports of known or suspected violations of the law or of this Code of Ethics & Conduct will be handled sensitively and with discretion. Petco prohibits retaliation against any Partner who seeks help in good faith or reports known or suspected violations. Petco hopes you share our belief that a commitment to ethical behavior is the right thing to do.

# Do What's Right.



**petco**hotline

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