



SUMMARY SUPPLIER CODE OF CONDUCT

This Summary Supplier Code of Conduct (the “Code”) clarifies the minimum standards that factories and suppliers (the “Production Partners”) with whom PetSmart, Inc. or its subsidiaries and affiliates (“PetSmart”) conduct business are required to satisfy in conducting their operations.

BUSINESS INTEGRITY

Business must be carried out with the highest standard of ethical conduct and integrity. All aspects of a Production Partner’s business, including sourcing, operations, and practices, are required to be conducted ethically and in compliance with all applicable laws and regulations.

- **Anti-corruption.** The offering, paying, soliciting or accepting of bribes or kick-backs is strictly prohibited. Production Partners must comply with all applicable anti-bribery and corruption laws. Production Partners will not offer bribes, kickbacks, illegal political contributions, or other improper payments to PetSmart or any of its associates, agents or consultants, any government official, or other third party.
- **Subcontracting.** Production Partners may not subcontract any portion of the manufacturing process without prior written consent from PetSmart. Production Partners are responsible for ensuring all approved subcontractors comply with this Code.

Labor and Human Rights

PetSmart believes that all the workers within our supply chain deserve a fair and ethical workplace. PetSmart expects Production Partners to treat their workers with dignity and respect and to uphold the highest standard of human rights.

Each PetSmart Production Partner will:

- **Prevention of Underage Labor.** Employ workers who are at least 15 years of age or the legally required minimum age, whichever is higher.
- **Juvenile Workers Protections.** If it employs workers older than the legally required minimum age but younger than 18, adhere to the principles set out in the ILO Minimum Age Convention No. 138, including preventing such workers from performing work that might jeopardize their health, safety, or morals.
- **Voluntary Labor.** Not use forced, bonded, prison or indentured labor. Not engage or support human trafficking. All labor must be voluntary.
- **Working Hours.** Ensure that its workers’ working hours are not excessive. Comply with all applicable laws with respect to working hours and days of rest. All overtime must be voluntary.
- **Compensation.** Pay workers a fair wage commensurate with prevailing industry standards. Workers wages, overtime and benefits should meet or exceed legal standards or collective agreements, whichever are higher.
- **Freedom of Associations.** Respect the right of its workers to freely choose whether or not to join associations, organizations and trade unions, and to bargain collectively, as provided by local law or regulation.
- **Health and Safety.** Provide a workplace that meets applicable health and safety standards and supports accident prevention for all personnel. Identify and manage occupational health and safety hazards through hazard elimination and engineering and administrative controls.
- **Antidiscrimination.** Promote a workplace that is free of discrimination in hiring and other employment practices, and not discriminate against any worker based on age, disability, ethnic origin, national origin, gender, marital status, physical appearance, pregnancy, race, religion, sexual orientation, or union association.
- **Anti-harassment.** Promote a workplace that is free of harassment and will not threaten workers or subject them to harsh or inhumane treatment, including verbal abuse, psychological harassment or sexual harassment.

SECURITY

Production Partners will comply with applicable U.S. Customs importing laws and security processes, including without limitation Customs-Trade Partnership Against Terrorism (C-TPAT), or other applicable importing laws or securing processes of jurisdictions where products will be shipped.

ENVIRONMENT

Manufacturing processes should minimize the adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public. This includes meeting all relevant local and national environmental protection laws.

RECORDS AND INSPECTIONS

Production Partners will maintain accurate records and information and permit PetSmart or its representatives to periodically conduct announced and unannounced audits of such records and information.

CONFIDENTIAL INFORMATION

Production Partners will use PetSmart confidential information only for the purpose for which it is provided and will not improperly use or disclose any of PetSmart’s confidential information, including trade secrets. Production Partners will not use the name “PetSmart” or any other name, mark, logo, design, product designations or other intellectual property of PetSmart without PetSmart’s written permission.