

# Business Ethics and Compliance

Standards of Business Conduct

STARBUCKS®





# Dear Fellow Partner:

Starbucks is the premier roaster and retailer of specialty coffee in the world and has become a truly global brand. From the beginning, we have recognized that you, our partners, are critical to our continued success. Starbucks reputation for the finest coffee in the world, legendary customer service and the highest integrity is the direct result of our collective efforts. We are all caretakers of Starbucks reputation. How we conduct our business and how we treat others—our fellow partners, customers, communities, suppliers and shareholders—will continue to determine how the world views Starbucks.

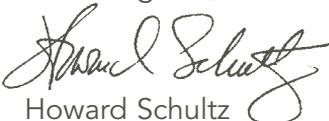
“Starbucks reputation for the finest coffee in the world, legendary customer service and the highest integrity is the direct result of our collective efforts.”

Each of us is personally responsible for supporting our core values, which require compliance with the law as well as ethical conduct. We have issued the *Standards of Business Conduct* to restate our longstanding commitment to uphold that responsibility and to provide guidance to our partners.

As we move forward, the *Standards* will help ensure that our values continue to be reflected in each Starbucks store and business activity. A commitment to integrity, acting honestly and ethically, and complying with the letter and intent of the law are critical to our continued success.

Thank you for your partnership.

Warm regards,

A handwritten signature in black ink, appearing to read "Howard Schultz". The signature is fluid and cursive, with the first name "Howard" and last name "Schultz" clearly distinguishable.

Howard Schultz  
chairman, president and  
chief executive officer

# Our Starbucks Mission

To inspire and nurture  
the human spirit—one person,  
one cup, and one  
neighborhood at a time.

Here are the principles of how we live that every day:

## **Our Coffee**

It has always been, and will always be, about quality. We're passionate about ethically sourcing the finest coffee beans, roasting them with great care, and improving the lives of people who grow them. We care deeply about all of this; our work is never done.

## **Our Partners**

We're called partners, because it's not just a job, it's our passion. Together, we embrace diversity to create a place where each of us can be ourselves. We always treat each other with respect and dignity. And we hold each other to that standard.

## **Our Customers**

When we are fully engaged, we connect with, laugh with, and uplift the lives of our customers—even if just for a few moments. Sure, it starts with the promise of a perfectly made beverage, but our work goes far beyond that. It's really about human connection.

## **Our Stores**

When our customers feel this sense of belonging, our stores become a haven, a break from the worries outside, a place where you can meet with friends. It's about enjoyment at the speed of life—sometimes slow and savored, sometimes faster. Always full of humanity.

## **Our Neighborhood**

Every store is part of a community, and we take our responsibility to be good neighbors seriously. We want to be invited in wherever we do business. We can be a force for positive action—bringing together our partners, customers, and the community to contribute every day. Now we see that our responsibility—and our potential for good—is even larger. The world is looking to Starbucks to set the new standard, yet again. We will lead.

## **Our Shareholders**

We know that as we deliver in each of these areas, we enjoy the kind of success that rewards our shareholders. We are fully accountable to get each of these elements right so that Starbucks—and everyone it touches—can endure and thrive.

# Onward.



# Look Inside

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# About the Standards of Business Conduct

Starbucks empowers all partners to make decisions that impact our reputation.

Individual actions at work shape how the world views Starbucks, which is why it's so important that we each take responsibility for Our Starbucks Mission and acting ethically in all situations.

The *Standards of Business Conduct* support the Global Business Ethics Policy and provide an overview of some of the legal and ethical standards we are each expected to follow every day. If you are unsure of what to do in a situation, you have support. Speak with your manager, Partner Resources or Business Ethics and Compliance about your concerns.

Please read the *Standards* carefully at work. If you have any questions, refer to the "Asking for Guidance and Voicing Concerns" section of this booklet.

This information is available in accessible formats.

Contact [diversity@starbucks.com](mailto:diversity@starbucks.com) for more information.

# Asking for Guidance and Voicing Concerns

Starbucks core values require compliance with the law, as well as ethical conduct. If you feel these standards have not been met, need access to policies, or have any questions, please ask for guidance or voice your concerns by contacting any of the following resources:

- Your manager or skip-level manager
- Your Partner Resources representative
- Business Ethics and Compliance

Please use one of the methods below to reach Business Ethics and Compliance. (See “Contact Information” on back inside cover for details.)

The Ethics and Compliance Helpline is a free phone number, which you may use to ask questions or raise concerns. The Helpline is available 24 hours a day, seven days a week, and an interpreter can be made available upon request.

The Ethics and Compliance Weblines is an online tool that serves as another way for partners to ask for guidance or voice concerns.

Your concerns will be taken seriously, and all information provided to the Helpline or Weblines will be treated in a confidential manner. Please be aware that information provided to Business Ethics and Compliance is directed to the United States. Every reasonable effort will be made to protect the security of any personal data collected and to avoid unauthorized use or disclosure of such data. Questions or concerns may be submitted to the Helpline or Weblines anonymously.

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**Anti-Retaliation Policy: Starbucks does not tolerate retaliation against or the victimization of any partner who raises concerns or questions regarding a potential violation of the *Standards of Business Conduct* or any Starbucks policy that he or she reasonably believes to have occurred.**



# Workplace Environment

## How We Treat One Another

Consistent with Starbucks Global Human Rights Standard, Starbucks promotes equal opportunity in its hiring practices, makes recruiting decisions based solely on job-related criteria and does not use forced labor. When employing partners under the age of 18, managers must comply with all Starbucks-established or legally required limitations on minimum hiring age, and on hours and tasks performed by these partners to ensure any work performed does not hamper the partner's education, health, safety, and mental or physical development.

For further information, refer to the Global Human Rights Standard, which can be obtained by contacting Business Ethics and Compliance.

At Starbucks we treat each other with respect and dignity. This means that all partners are entitled to work in an environment that is free of harassment, bullying and discrimination.

Harassment, bullying and discrimination take many forms, including:

- Unwelcome remarks, gestures or physical contact
- The display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including by email and on the Internet
- Offensive or derogatory jokes or comments (explicit or by innuendo)
- Verbal or physical abuse or threats

**Q: One of my co-workers emailed an inappropriate joke to me and some teammates. I find it offensive, but I don't know if I should approach my co-worker with my concern. What should I do?**

**A: We each have an obligation to ensure that Starbucks is a great place to work for all partners, and offensive behavior such as this is not acceptable. If you feel uncomfortable speaking with your co-worker directly, contact your manager, Partner Resources or Business Ethics and Compliance.**

Q&A

## How We Treat Our Customers

Legendary customer service is a top priority at Starbucks. We strive to make every customer's experience pleasant and fulfilling, and we treat our customers as we treat one another, with respect and dignity. This means, for example, that we never harass or discriminate against our customers.

“We treat our customers as we treat one another, with respect and dignity.”

## Diversity

Starbucks actively creates and promotes an environment that is inclusive of all people and their unique abilities, strengths and differences, and promotes diversity as a strategic and competitive business advantage for the company.

“We respect diversity in each other, our customers and suppliers and all others with whom we interact.”

As we continue to grow, embracing diversity in every aspect of our business—from the way we work together to the way we procure goods and services—is vital to our long-term success. We respect diversity in each other, our customers and suppliers and all others with whom we interact. Our goal is to be one of the most inclusive companies globally, working toward full equity, inclusion and accessibility for those whose lives we touch.

## Workplace Health, Safety and Security

Partners are expected to follow all safety rules and practices; cooperate with officials who enforce these rules and practices; take necessary steps to protect themselves and other partners; attend required safety training; and report immediately all accidents, injuries and unsafe practices or conditions.

In order to enhance workplace security, you should be familiar with and follow any work safety information and training provided to you.



**Q: Our work safety standards far exceed what is required by law where I work and our competitors only follow local requirements. Shouldn't we do the same?**

**A: No. We must adhere to our company safety policies. Starbucks is committed to providing partners with a safe and secure environment everywhere we operate, even if this means we exceed local requirements.**

## **Starbucks Quality and Customer Protection**

Starbucks commitment to quality means that we take steps to protect our customers' health and safety. You can play your part by following all proper procedures relating to the storage, handling, preparation and service of Starbucks® coffee and other products; by working to ensure clean, sanitary and safe conditions in all of our facilities; and by continually exploring ways to maintain and improve Starbucks quality standards and practices.

Please notify your manager immediately if you become aware of anything that suggests that a product, process or situation may pose a danger to health or safety. Starbucks has established procedures for such situations, and your manager is aware of the appropriate steps to take.

## **Substance Abuse and Weapons**

Starbucks has strict standards regarding substance abuse and weapons. Partners are not permitted to use or possess alcoholic beverages on company property, except where alcohol is specifically permitted at a Starbucks-sponsored social event. An exception applies if your job involves the sale of alcohol, but in that case, you may not consume the alcohol and must participate in any special training required for that business.

You also may not use or possess illegal drugs or controlled substances on Starbucks property or while you are engaged in any job-related activity. Partners may not report to work under the influence of alcohol, illegal drugs or controlled substances.

Partners may not have or possess any weapon while in a Starbucks store, plant or on other Starbucks property. Starbucks takes its rules regarding workplace health, safety and security very seriously. It is essential that you understand and follow them, together with any more detailed guidance provided to you.

## **Wage and Hour Rules**

Starbucks is committed to following all applicable wage and hour laws and regulations. To help ensure that all work performed for Starbucks is compensated correctly, partners compensated on the basis of hours worked must report and record time accurately in accordance with established local procedure.

**Q:** Lately my store has been very busy and it has been hard to find time to do routine cleaning. At this morning's store meeting, our manager told everyone that if they don't complete their tasks before they punch out they will have to stay "off the clock" to do so. Is it okay for our manager to ask this of us?

**A:** No. Working off the clock is strictly prohibited by Starbucks. Starbucks is committed to ensuring that all partners are accurately compensated for all work performed. Any requests to work off the clock must be reported to Partner Resources or Business Ethics and Compliance.

# Business Practices

## Compliance with Laws and Regulations

Starbucks is committed to full compliance with the laws, rules and regulations of the countries in which it operates. You must comply with all applicable laws, rules and regulations when performing your duties.

When you think a conflict exists between the *Standards* and an applicable law, rule or regulation, or if you have a question concerning the legality of your or other partners' conduct, you should consult with your manager or another party described in the "Asking for Guidance and Voicing Concerns" section of this booklet.

## International Business

Starbucks is committed to the highest ethical standards in all business transactions. Partners must follow all applicable laws, rules and regulations when conducting Starbucks business.

"Starbucks will be accurate and truthful in representing business transactions to government agencies."

Payments made to any foreign agent or government official must be lawful under the laws of the United States and the foreign country. Payments by or on behalf of Starbucks to foreign agents or government officials should always be strictly for services rendered and should be reasonable in amount given the nature of those services. Under no circumstances may a partner make payments in violation of the law or to induce government officials to do business with Starbucks.

Partners must comply with all local and foreign laws regarding customs and trade. Starbucks will be accurate and truthful in representing business transactions to government agencies. All information that a partner furnishes to any customs official or to any agent hired by Starbucks to facilitate imports and exports must be accurate and truthful. If you conduct business internationally on behalf of Starbucks, please make sure you have a thorough understanding of these laws and know enough about any third parties doing business in Starbucks name to ensure they are making appropriate decisions on our behalf.

Starbucks partners at no time are permitted to influence the outcome of any business decision by exchanging bribes or kickbacks of any kind.

## Interaction with the Government

Starbucks is committed to complying with local laws, regulations and codes and to working fairly and honestly with government officials and others in our communities. In doing so, our actions must meet high ethical and legal standards. It is against Starbucks policy (and may be a breach of law) to offer or make a payment or gift of any kind in order to facilitate a local process or to influence a local government official.



## “Partners must be truthful and straightforward in their dealings with the government.”

If you are contacted by a government or regulatory representative and asked to provide information or submit to an inspection, you should inform your manager immediately. Your manager will take appropriate actions or contact the appropriate department for guidance.

Starbucks policy is to deal honestly and fairly with government authorities and to comply with valid governmental requests and processes. Partners must be truthful and straightforward in their dealings with the government and may not direct or encourage another partner or anyone else to provide false or misleading information to any government official or representative. Partners must not direct or encourage anyone to destroy records relevant to an investigation.

**Q: We use an agent to facilitate relations with local government officials. Recently he asked us to increase his commission, and I suspect he wishes to pass this money on to the local officials. What should I do?**

**A:** If you suspect that the agent is making illegal payments on Starbucks behalf, the company is under an obligation to investigate whether this is the case and to halt any such payments. You should report your suspicions to your manager or Business Ethics and Compliance.

Q&A

Starbucks commitment to working fairly and honestly with the government includes all interactions with government officials.

Certain partners will be notified and trained on a regular basis for the purposes of compliance with relevant federal laws, including those regarding lobbying disclosure, anti-bribery and anti-corruption.

## **Sales Practices and Advertising**

Starbucks competes on the merits of our products and services in all sales and advertising. Our communications with our customers or potential customers must be truthful and accurate. When we say something about our products and services, we must be able to substantiate it. We sell the quality of what we do; we do not disparage our competitors.

## **Fair Competition**

Fair competition laws are intended to promote vigorous competition in a free market. It is in Starbucks best interest to promote free and open competition. Starbucks must make its own business decisions, free from understandings or agreements with competitors or suppliers that restrict competition. We consider compliance with these laws of vital importance.

When conducting Starbucks business, all partners must:

- Not discuss pricing, production or markets with competitors
- Not set resale prices with customers or suppliers
- Always present Starbucks services and products in a manner consistent with our core values
- Not induce a third party to breach an existing agreement
- Never act in a manner that could be seen as an attempt to exclude present or potential competitors or to control market prices

## **Q&A**

### **Q: I am going to a trade show. May I go to a competitor's booth?**

A: Yes. You may go to the booth and collect any publicly distributed material. However, if you talk to anyone at the booth, identify yourself as a Starbucks partner, and avoid conversations about business. If you have any questions, a good practice is to consult Law & Corporate Affairs for guidance before you attend.

### **Q: A salesperson for a competitor and I are friends. Occasionally we talk about marketing plans. Should I be concerned?**

A: Yes. You are revealing confidential information that Starbucks has invested time and money to develop. You also may be violating competition laws that ban discussions of marketing and pricing.

## Conflicts of Interest

We all must avoid conflicts of interest. A conflict of interest exists when a personal interest or activity interferes or appears to interfere with the duties that you perform at, or owe to, Starbucks. A conflict of interest may unconsciously influence even the most ethical person and the mere appearance of a conflict may cause a partner's acts or integrity to be questioned.

In addition to annual disclosure, potential conflicts of interest must be disclosed to the partner's manager or the vice president in charge of the partner's department or business unit, who will contact the chief ethics and compliance officer (CECO). If the partner prefers, disclosure can be made directly to the CECO via Business Ethics and Compliance.

**Q: I have a relative I'd like to hire to do some work at Starbucks. Since it's a legitimate project that needs to be done, and my relative is trained to do this type of work, is it okay if I hire her?**

**A:** Although the work is legitimate, this situation creates the appearance of a conflict. The circumstances of this situation should be raised with Business Ethics and Compliance so that an independent review can be done prior to committing to a contract. This will help protect you, your relative and Starbucks if the relationship ever comes into question.

Some examples of situations in which conflicts of interest may arise:

- Being employed by or operating a firm, including consulting, that does or desires to do business with Starbucks or that competes with Starbucks (for example, working in a competitor's coffee shop)
- Making a substantial direct investment in such a firm (by you or a member of your immediate family)
- Acting on behalf of anyone besides Starbucks in any transaction with Starbucks (for example, helping someone sell products and/or services to Starbucks)
- Engaging personally in transactions in which Starbucks has an interest

## Gifts and Entertainment

A gift or favor should not be accepted or given if it might create a sense of obligation, compromise your professional judgment or create the appearance of doing so. In deciding whether a gift is appropriate, you should consider its value and whether public disclosure of the gift would embarrass you or Starbucks.

“Giving or accepting valuable gifts or entertainment might be construed as an improper attempt to influence the relationship.”

A gift of money should never be given or accepted. (Some retail partners, however, may accept customary tips for service well done.) As a general rule, partners should limit gifts to or from any one vendor or business associate to US \$75 per year. A gift of nominal value may be given or accepted if it is a common business courtesy, such as coffee samples, a coffee cup, pens or a similar token.

However, during traditional gift-giving seasons in areas where it is customary to exchange gifts of money, such as China, Japan, Malaysia, Singapore and Thailand, partners should not solicit but may exchange cash with nongovernmental business associates in nominal amounts up to the equivalent of US \$20.

Trading items of value with other businesses, including shops and restaurants, is strictly prohibited.

You may not encourage or solicit meals or entertainment from anyone with whom Starbucks does business or from anyone who desires to do business with Starbucks. Giving or accepting valuable gifts or entertainment might be construed as an improper attempt to influence the relationship.



**Q: May I accept a business meal from a supplier?**

**A:** In most circumstances, modest and infrequent business meals may be accepted. However, whenever a supplier pays for a meal, always consider the specific circumstances and whether your impartiality could be compromised or appear to others to be compromised. If the meal is offered during contract negotiations, you must always politely decline the invitation. Talk with your manager if you are unsure.

Partners may offer or accept meals and entertainment if they are reasonable and customary, appropriate, occur infrequently and are not expensive. Please consult the travel and/or expense guidelines for your business unit or department for additional guidance.

Starbucks prohibits offering, giving, soliciting or receiving any form of bribe or inducement. There are serious penalties for engaging in this conduct.



**Q: A vendor I work with just finished an important project for me on time and under budget. I would like to show my appreciation with a gift. What is appropriate?**

**A:** When we give gifts, we set the tone for how we conduct business—purely on business considerations. Keep this in mind when selecting a gift for a vendor. As a general rule, partners should limit gifts to or from any one vendor or business associate to US \$75 per year. Also take into consideration their company's gifts and entertainment policy. Just as we want others to respect our standards, we want to be mindful of theirs.

## Securities

As a partner, you may become aware of significant and confidential information about Starbucks business, often called “material non-public information.” Partners may not buy or sell stock (including by cashless exercise of stock options) or any other security on the basis of this information. In order to avoid any potential problems, you should interpret the term “material non-public information” broadly.

Some examples of material information include:

- Financial information
- The development of new products or services
- A proposed acquisition, joint venture or merger
- Government investigations
- Changes in key personnel

Information is considered to be non-public unless it has been adequately disclosed to the public. Examples of effective disclosure include public filings with securities regulatory authorities and the issuance of company press releases.

There also must be adequate time for the market to digest the information. Starbucks requires that the information must be publicly available for at least one full business day before you may trade in Starbucks securities. Certain executives and partners with regular access to material non-public information also may not trade during the blackout periods established by Starbucks.

**Q: My family and friends often ask me about Starbucks and whether they should buy stock. Usually I tell them what I know about our business and suggest they buy stock. Is this a problem?**

**A:** The same rules about inside information apply whether you buy or sell stock yourself or if you give the information to someone else—known as “tipping.” If a relative or friend buys or sells stock based on non-public information that you give him or her, both of you could be liable for violation of securities laws. Furthermore, you could be in violation simply for sharing material non-public information, regardless of whether or not he or she uses it or benefits from it.

For more information, refer to the Insider Trading Policy, which can be obtained by contacting Business Ethics and Compliance.



# Intellectual Property and Proprietary Information

## Confidential Information

During the course of employment at Starbucks, all partners gain some knowledge and information that is non-public and belongs to Starbucks. Partners are trusted with maintaining the confidentiality of this valuable information.

“Starbucks information should be used only for company purposes and should not be disclosed to anyone outside of Starbucks.”

Confidential information includes things such as supplier information, Starbucks technologies, recipes, formulas, coffee blends, business and marketing plans, internal company communications, and existing and future product information.

Starbucks information should be used only for company purposes and should not be disclosed to anyone outside of Starbucks. Even within the company, only those individuals who truly need to know the information to conduct their business should have access to confidential information. If you leave Starbucks, you must return all company materials and property, and any copies.

Confidential materials should:

- Be stored in a secure place and should not be left out where others can see them
- Be clearly marked as confidential
- Not be sent to unattended fax machines or printers
- Not be discussed where others may hear

Starbucks is committed to being fair in the areas of confidential information and materials. Just as we take care to protect our information, Starbucks respects the information of others.

Here are some basic rules to follow:

- Do not bring any material from prior employers to Starbucks
- Do not accept or use anyone else's confidential information (or agree to maintain anyone's information in confidence)
- Do not solicit confidential information from another company's present or former employees or suppliers

- Do not engage in espionage; be transparent in obtaining information about the marketplace

**Q: I am able to get an early start on my day by returning calls during my train ride to work. Is this a problem?**

**A:** You must be careful not to discuss non-public company information in public places where others may overhear you, such as taxis, elevators or at conferences and trade shows. When it is necessary to conduct a telephone call in a public place, be mindful of your surroundings.

## Other Intellectual Property

As a partner, the things you create for Starbucks belong to the company. This includes inventions, discoveries, ideas, improvements, software programs, artwork and works of authorship. This work product is Starbucks property if it is created or developed, in whole or in part, on company time, as part of your duties or through the use of company resources or information.

Partners must promptly disclose to Starbucks, in writing, any such work product and cooperate with the company's efforts to obtain protection for Starbucks.

To ensure that Starbucks receives the benefit of work done by outside consultants, it is essential that an appropriate written agreement or release be in place before any work begins.

“Brands are fragile and must be used carefully and protected from misuse.”

Remember, too, that our brands, including the Starbucks name, are extremely valuable to Starbucks success. Brands are fragile and must be used carefully and protected from misuse. Consult Starbucks guidelines for proper trademark usage.

When Starbucks uses the work product of others, including art and music, we must also be sure to follow the rules. For example, you should only use software for which you have a valid license and should only use that software in accordance with the terms of the license for that software. Written materials and music may be subject to copyright protection and should be copied only when permitted. Use caution, as not all copyrighted materials bear a notice.

## Use and Retention of Company Records

Starbucks Information Management Policy states that partners will manage information in such a way that supports the needs of the business while ensuring efficiency, security and compliance with any legal or regulatory requirements. This policy applies to records maintained in all forms at Starbucks, including paper and electronic.

If you are responsible for preparing or maintaining any Starbucks records, please familiarize yourself with the *Starbucks Records Management Handbook*, the *Starbucks Records Retention Schedule* and specifically the retention periods that

apply to the records you keep. Also remember that there are strict rules relating to the processing and handling of private and secret information. This includes collecting, storing, using, amending, disclosing and destroying information.

- Records must always be prepared accurately and reliably, and stored properly in accordance with the *Starbucks Records Management Handbook* and the *Starbucks Records Retention Schedule*.
- Records must accurately and fairly reflect, within Starbucks normal accounting and reporting systems, all required transactions and other events.
- There cannot be any unrecorded company funds, assets or any other type of “off the books” accounts, no matter what the reason for such accounts.

You must not knowingly destroy or discard information that is subject to a legal hold. Records relevant to a legal action cannot be destroyed or discarded and must be preserved. If Starbucks receives a subpoena (or other form of legal order), a request for records or other legal papers, or if we have reason to believe that such a request or demand is likely, the company policy is to retain all information that is relevant to the matter.

“There are strict rules relating to the processing and handling of private and secret information.”

## **Books and Records**

All partners must ensure the accuracy and integrity of Starbucks corporate records. This includes reliability and accuracy of books and records, as well as honesty in disclosures and in providing information.

The books of account, financial statements and records of Starbucks should be maintained in accordance with the requirements of law and generally accepted accounting principles. All of Starbucks assets and liabilities should be properly recorded in its books.

Costs and revenues must be recorded in the right time periods. The sale has not officially been completed until there is evidence of a sales agreement, the title has passed, and the sales price can be determined and is reasonably collectible. Until then, it would be a misrepresentation to record it.

## **Financial Accounting, Internal Controls and Auditing Matters**

Concerns regarding accounting, internal accounting controls or auditing matters should be promptly reported through the Ethics and Compliance Helpline or Webline, described in the “Asking for Guidance and Voicing Concerns” section of this booklet. Reports may be made anonymously and will be treated in a confidential manner.

Depending on how they are classified, reports of this nature will be routed to Business Ethics and Compliance, the chief ethics and compliance officer or the general counsel in Starbucks U.S. head office, the Audit and Compliance Committee of the Board of Directors or the presiding independent director of the Board.



# Community Involvement

## **Environmental Mission Statement**

Starbucks is committed to a role of environmental leadership in all facets of our business.

We fulfill this mission by a commitment to:

- Understanding environmental issues and sharing information with our partners
- Developing innovative and flexible solutions to bring about change
- Striving to buy, sell and use environmentally friendly products
- Recognizing that fiscal responsibility is essential to our environmental future
- Instilling environmental responsibility as a corporate value
- Measuring and monitoring our progress for each project
- Encouraging all partners to share in our mission

## **Environmental Commitment**

All partners should seek ways to proactively address the environmental impacts of our operations and incorporate the principles of the environmental mission statement into their work. At a minimum, we all must ensure that Starbucks business practices and activities comply with the letter and intent of the law and all company policies.

Starbucks understands that environmental responsibility is necessary if we hope to preserve our world for generations to come. Our commitment to contribute positively to the environment is of the utmost importance to our company. We elaborated further on this commitment in 1992 when we adopted our environmental mission statement, which guides our approach to minimizing our environmental footprint. Starbucks has continuously evolved and expanded our definition of environmental responsibility and what it means to be an environmental leader.

## **Personal Activities**

Starbucks understands the need for balance between work, personal and family life, and we encourage partners to be involved in their communities. However, partners should not impose their personal beliefs or opinions on other partners or represent their personal opinions as those of Starbucks.

You may keep your personal activities outside of the workplace confidential, but always keep in mind that you are a representative of Starbucks. Your conduct can affect perceptions of the Starbucks brand and service.

## **Political Activities**

Political activities must be conducted on your own time and using your own resources. You must not promote any political or personal views or beliefs (including by posting or distributing notices or other materials) on or around Starbucks premises, and you may not indicate or suggest that you speak for Starbucks or that the company supports your views.

## **Public Relations**

All information disclosed outside of the company must be accurate, complete and consistent, and disseminated in accordance with Starbucks policies. We all represent Starbucks; if someone asks you for information (for example, the media or investors), be sure to notify your manager or department head about the request. They will contact the appropriate party to ensure that the correct procedure is followed. Please do not attempt to answer these questions yourself.

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The standards and policies stated herein are not all the applicable Starbucks standards and policies nor are they a comprehensive or complete explanation of the laws that are applicable to Starbucks and its partners in any particular country. All Starbucks partners have a continuing obligation to familiarize themselves with applicable laws relating to their job responsibilities and all Starbucks policies. Breach of these standards, Starbucks policies or the law may give rise to disciplinary action up to, and including, dismissal.

The standards and policies discussed herein may be amended from time to time. Partners should access the *Standards of Business Conduct* posted at [www.starbucks.com](http://www.starbucks.com) for the most current version.

# Ethical Decision-Making Framework



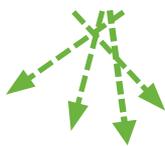
List possible solutions (what could you do?) and any obstacles to resolving the problem.

Determine the best approach (what should you do?).



- Is it consistent with Our Starbucks Mission, the *Standards of Business Conduct* and any applicable law or regulation?
- Would your approach embarrass you or Starbucks?
- How would your approach look published in the newspaper?
- Would you be comfortable with the example it sets for future decisions?

If the path isn't clear



ask for guidance

A vertical dashed green arrow pointing downwards with the text "ask for guidance" written vertically inside it.



## You Are Empowered

You can deliver great customer experiences, knowing that Starbucks supports you in doing the right thing and conducting business with integrity.

## You Have Responsibility

You play a critical role in ensuring that Starbucks is a great work environment and in protecting our culture, our reputation and our brand.

## You Have Help

If you are unsure of what to do in a situation, you have resources available to you, including Partner Resources, the *Standards of Business Conduct* and Business Ethics and Compliance.

## You Have a Voice

When you believe something isn't right, you can speak up and share your concerns, knowing that Starbucks wants to hear them and does not tolerate retaliation against partners.

# Frequently Asked Questions

**Q: What is Starbucks Business Ethics and Compliance?**

A: Starbucks Business Ethics and Compliance, which includes Starbucks Policy Office, is a program that supports Our Starbucks Mission and helps protect our culture and our reputation by providing resources that help partners make ethical decisions at work.

**Q: What are Starbucks Standards of Business Conduct?**

A: The *Standards of Business Conduct* is a resource distributed to all partners to help them make appropriate decisions at work. The *Standards* are a brief statement of some of the company's expectations of how we are all to conduct Starbucks business.

**Q: What am I expected to do with the Standards of Business Conduct?**

A: Read the *Standards* carefully at work and make sure that you understand them. If you have any questions or concerns, ask your local Partner Resources representative or contact Business Ethics and Compliance via the contact information listed on the back inside cover of this booklet.

**Q: What is Starbucks Ethics and Compliance Helpline?**

A: The Ethics and Compliance Helpline is a free phone number for reporting issues or raising concerns that involve ethics, legal issues or potential violations of Starbucks policy, including the *Standards of Business Conduct* and our core values. No charges will apply to the call, and it is answered live, by a third party, 24 hours a day, seven days a week.

**Q: May I call the Helpline if I am not fluent in English?**

A: Yes. A live interpreter can be made available upon request.

**Q: What happens when a call is placed to the Helpline?**

A: Calls to the Helpline are answered by a third party outside of Starbucks. Trained specialists speak with callers regarding their questions or concerns and then forward a report to a Business Ethics and Compliance partner who works with the appropriate party or department for investigation and any appropriate action.

**Q: May I call the Helpline anonymously?**

A: Yes. You will be given a unique report number, which will allow you to call the Helpline again and anonymously check on the status of your report. Calls to the Helpline are not traced and are handled in a confidential manner. We encourage callers to provide their names and contact numbers because calls in which the caller does not provide those details can be more difficult to investigate.

Starbucks cannot guarantee your anonymity if you identify yourself or give information from which you can be identified, but the company will take every reasonable precaution to assure that the identity of a caller remains as confidential as possible.

**Q: What is the Ethics and Compliance Webline and how does it differ from the Helpline?**

A: The Ethics and Compliance Webline is a tool that serves as another way for partners to ask for guidance or to voice concerns. As with the Helpline, concerns may be submitted anonymously and will be treated in a confidential manner.

**Q: Can I be retaliated against or victimized for using the Helpline or Webline?**

A: Starbucks does not tolerate retaliation against or the victimization of any partner who raises concerns or questions regarding a potential violation of Starbucks policy that he or she reasonably believes to have occurred.

**Q: How do the Helpline and Webline fit with Partner Resources and my local policies and procedures, including my local grievance procedure?**

A: Business Ethics and Compliance works with appropriate local partners to investigate and resolve concerns reported to the Helpline or Webline. In addition to your manager and Partner Resources representative, they are additional ways for partners to speak up.

**Q: Who is my contact for more information or to obtain policies?**

A: Contact your local Partner Resources representative or Business Ethics and Compliance via the Helpline, Webline or email.

# Contact Information

Starbucks Business Ethics and Compliance provides information and resources that support ethical business practices. If you have a compliance, legal or ethics concern, please contact your manager, Partner Resources or Business Ethics and Compliance.

## Ethics and Compliance Helpline

Australia	1-800-45-4956 or 1-800-15-4867
Brazil	0800-892-1655
Canada–English	1-800-611-7792
Canada–French	1-866-614-0760
Chile	1230-020-5460
China–North	10-800-711-0718
China–South	10-800-110-0661
Costa Rica	0800-011-0928
France	0-800-91-5128
Germany	0-800-182-2581
Hong Kong	800-90-8032
Netherlands	0-800-022-2214
Puerto Rico	1-800-611-7792
Republic of Ireland	1-800-55-8618
Singapore	800-110-1584
Switzerland	0-800-56-1170
Thailand	001-800-11-005-7967
United Kingdom	0-800-028-3528
United States	1-800-611-7792

## Areas That Do Not Yet Have a Local Helpline Number

To place a free call to the Helpline or as a backup for numbers above, please contact your local operator and ask to place a “reverse charge” or “collect” call to the United States, number 678-250-7560. If you would like to place your call anonymously, please say “Miss Starbucks” or “Mister Starbucks” when the operator requests your name.

## Ethics and Compliance Weblne

<https://BusinessConduct.EAWeblne.com>

## Email

[EthicsAndCompliance@Starbucks.com](mailto:EthicsAndCompliance@Starbucks.com)



