



## **Starbucks Global Anti-Bribery Standard**

### Bribes And Kickbacks

Starbucks is committed to doing business fairly and honestly, and prohibits partners from giving or receiving bribes or kickbacks of any kind.

Partners must not directly or indirectly:

- Accept anything of value that would improperly impact, or might be perceived to improperly impact, the outcome of any business transaction or may place them in a position of obligation
- Authorize or make payments, promises or offers of anything of value including money, gifts, entertainment, travel and lodging, to obtain or retain business, secure an improper advantage or in response to a decision to enter into a business agreement with Starbucks

### Government Officials<sup>i</sup>

Payments to government officials must always be strictly for official services rendered and must be reasonable in amount given the nature of those services.

### U.S. Congress and Federal Executive Branch

Partners must not provide, request, or direct a gift, including travel, to U.S. federal government officials (e.g., legislators, legislative staff, agency personnel, military personnel).

Partners must not use personal expenditures to circumvent this Standard.

### Facilitating Payments<sup>ii</sup>

Partners must not pay facilitating payments.

In exceptional emergency situations involving personal health and safety, partners may make necessary facilitating payments. If this occurs, partners must report the payment immediately to Starbucks chief compliance officer.

### Use Of Third Parties

- Partners are prohibited from using any third party – for example agents, representatives, consultants, brokers, joint ventures, business associates, resellers, distributors, contractors – to circumvent this Standard.
- Before contracting with a third party, due diligence must be taken to confirm third party intermediaries are reputable and qualified. Additionally the third party's willingness to comply and history of compliance with this Standard and all applicable laws should be confirmed and included in a written contract.

### Books And Records

- Partners must request receipts and record payments for all services rendered.
- All payments and other activities conducted under this Standard must be accurately recorded in Starbucks books, records, and accounts, and in reasonable detail, fairly reflect the transactions and dispositions of the assets by the company.
- Partners must not circumvent or fail to implement a system of internal accounting controls or falsify any book, record, or account.

- All books, records, or accounts should be retained in accordance with Starbucks Records Retention Schedule.

#### Political Contributions Or Charitable Donations

- Partners must not circumvent this Standard by making political contributions or charitable donations to indirectly impact the outcome of a business transaction, including obtaining or retaining business.
- Only designated Starbucks partners may engage with political parties, party officials, candidates or organizations on Starbucks behalf.
- The Community Investments team of Global Responsibility must be informed of all charitable donations made on Starbucks behalf.
- Partners may participate in personal political activities as long as it is clear that they are acting in an individual capacity and not on behalf of Starbucks.

Refer to the [Starbucks Coffee Company Policy on Corporate Political Contributions and Expenditures](#) for more information.

#### Government Gifts, Entertainment, Travel and Lodging

Partners must not provide, request, or direct travel to U.S. federal government officials (e.g., legislators, legislative staff, agency personnel, military personnel).

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<sup>i</sup> An employee of any: government or its departments, ministries, agencies, military organizations or instrumentalities; political party; public international organization (e.g., United Nations, World Bank); or entity wholly or partially owned, sponsored, controlled by or affiliated with government, including entities with commercial functions or in which a government owns even a minority interest.

<sup>ii</sup> Payments made to secure or expedite the performance of routine services or actions to which a company is entitled.