

## What to Know

Dealings with government officials and authorities are subject to special considerations, so it's important to recognize when you are interacting with such an entity and to know the applicable rules.

Gifts or entertainment beyond nominal or token gestures should not be exchanged with government officials. It is also against Starbucks policy and may violate anti-bribery and other laws 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. These payments are typically referred to as facilitating payments.

All payments and gifts above a nominal amount to government officials are subject to strict recordkeeping requirements. If you believe that you have a compelling reason to give to or receive a gift from a government official, or to make a facilitating payment, you must first receive approval for the exception from Starbucks chief compliance officer. (Please see contact information on reverse side.)

## Examples of Possible Ethical Issues

- Your local government contact asks you to put in a good word for her daughter at the private school your children attend.
- You agree to pay your customs agent a commission if he can ensure Starbucks shipments get prioritized.
- In exchange for two bags a week of coffee beans, the local health inspector says she'll make only occasional inspections instead of the usual monthly inspection.

## Ask Yourself

- Could this interaction be perceived to give Starbucks an unfair advantage?
- Is a payment being requested to secure or expedite a routine service we should already be entitled to?
- Is this in compliance with Starbucks Anti-Bribery policy?

## Quick Tips

Gifts of nominal value may be given to officials if it is a common business courtesy, such as coffee samples, a coffee cup, pens or similar token.

Reasonable and customary entertainment may be extended to an official on an infrequent basis if it is lawful and common-practice.

Payments to government agents should always be strictly for official services provided and should be reasonable in value given the nature of those services.

Starbucks is responsible for third party actions on our behalf so use caution when hiring consultants or other intermediaries for matters involving government agencies.

Employees of government-owned companies should also be treated as government officials.

***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.***



**Business Ethics  
and Compliance**

Helping Partners Live Our Values

Business Ethics and Compliance is available  
24 hours a day, seven days a week via:

Business Conduct Webline:  
<https://BusinessConduct.EAWebline.com>

E-mail address:  
[BusinessConduct@Starbucks.com](mailto:BusinessConduct@Starbucks.com)



## Business Ethics and Compliance

Helping Partners Live Our Values

### Business Conduct Helpline:

Australia	1-800-45-4956 or 1-800-154-867
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	0-800-011-0928
France	0800-91-5128
Germany	0800-182-2581
Hong Kong	800-90-8032
Netherlands	0800-022-2214
Puerto Rico	1-800-611-7792
Republic of Ireland	1-800-55-8618
Singapore	800-110-1584
Switzerland	0800-56-1170
Thailand	001-800-11-005-7967
United Kingdom	0800-028-3528
United States	1-800-611-7792

Areas that do not yet have a local Helpline number: Place a free call to the Helpline by contacting your local operator and advising you would like 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.

Be advised that calls and electronic submissions are transferred to the United States.



## Interaction with the Government