



Code of Ethics

**At PETCO Animals Always Come First
Our People Make it Happen**



CODE OF ETHICS CONTACT INFORMATION

For easy reference, associates are encouraged to use the space below to record the contact information for their chain-of-command and local support team.

CHAIN-OF-COMMAND CONTACTS

Your Supervisor

Name: _____

Phone: _____

Person Above Your Supervisor

Name: _____

Phone: _____

General Manager

Name: _____

Phone: _____

District/Area Manager:

Name: _____

Phone: _____

Vice President Over Your Area

Name: _____

Phone: _____

LOCAL SUPPORT TEAM

Regional Companion Animal Coord.

Name: _____

Phone: _____

Regional Manager Asset Protection

Name: _____

Phone: _____

Regional HR Representative

Name: _____

Phone: _____

Regional HR Director

Name: _____

Phone: _____

NSC Human Resources:

Name: Ask for your region's representative

Phone: 1-888-583-6044

ADDITIONAL RESOURCES

PETCO Hotline	1-888-736-9834	ethics@petco.com
Internal Audit	1-858-453-7845 x3790	auditexec@petco.com
Law Dept	1-858-453-7845 x3791	law@petco.com

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DEAR PETCO ASSOCIATES:

At PETCO, we are committed to promoting, through our people, the highest level of well-being for companion animals and to supporting the human-animal bond. We can best achieve this goal by making sure that Animals Always Come First, and by recognizing that Our People Make It Happen.

We have established this Code of Ethics to inform PETCO associates of their moral, ethical and legal obligations – to the animals in our care, to our customers, vendors, fellow associates, to the communities we serve, and to PETCO.

This Code of Ethics brings together guidance on many of the ethical issues that associates may face on a day-to-day basis. We hope that it serves as a helpful reference, but it is important to remember that by its nature, the Code of Ethics offers summary information on many of the topics it covers. As such, associates should always refer to related Policies and Procedures if they need more detailed information.

It is critical that all associates understand and comply with this Code of Ethics. Compliance is a condition of employment for associates at all levels and PETCO is dedicated to its strict enforcement. If questions or concerns relating to the Code of Ethics arise, associates are encouraged and empowered to resolve those issues through their normal chain-of-command. However, a confidential Hotline is also available for associates to call 24 hours a day, 7 days a week to report concerns or to seek additional assistance.

PETCO's reputation as an industry leader and our passion for making our corporate Vision and Mission a reality can only be achieved through the honest and ethical efforts of our associates. So, whether you're caring for animals, assisting our customers, distributing inventory to stores, or supporting the field at the NSC, remember that your everyday decisions make all the difference in maintaining PETCO's high ethical standards.

At PETCO, we know that Our People Make It Happen and we're confident that with your dedicated commitment to ethical behavior, we will all do the right thing for PETCO and the many stakeholders we serve.

Jim Myers, CEO

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INTRODUCTION

It is the policy of PETCO Animal Supplies, Inc. (“PETCO” or “the Company”) to conduct business in accordance with a strict and specific Code of Ethics. All Board members, officers, managers, supervisors, and associates are expected to conduct business while adhering to high moral, ethical, and legal standards and to avoid any actual impropriety, or appearance of impropriety. To this end, all PETCO associates are expected to conduct business in full compliance with all applicable laws and regulations and with PETCO’s Policies and Procedures including, but not limited to, those discussed in this Code of Ethics. **PETCO does not tolerate retaliation against any associate who raises concerns or questions regarding a potential violation of PETCO’s Code of Ethics that the associate reasonably believes to have occurred.**

PETCO’S VISION, STRATEGY AND VALUE PROPOSITION

At PETCO Animals Always Come First, Our People Make it Happen

PETCO’s vision is to best promote, through our people, the highest level of well-being for companion animals and to support the human-animal bond.

PETCO’s strategy is to provide a broad array of premium products, companion animals, and services, and a fun and exciting shopping experience.

PETCO’s value proposition to the pet parent/customer is provided through friendly, knowledgeable associates in convenient, community-based location.

ANIMALS ALWAYS COME FIRST, OUR PEOPLE MAKE IT HAPPEN

At PETCO, we believe it is better to hire animal lovers and train them to work in a retail environment than to hire retailers and hope they like animals. This belief stems from PETCO’s commitment to making sure that Animals Always Come First and recognizes that Our People Make It Happen! 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 associates are expected to understand, support, and uphold.

What should I do if I have an animal care concern?

If you ever have an animal care concern, it is your responsibility to take the initiative to address the concern and make sure that appropriate action is immediately taken.

Animal Care

As PETCO associates, 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, associates 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 NSC personnel.

Each time 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 address your concern and make sure that appropriate action is immediately taken to resolve the concern.

PETCO associates must share and support PETCO's animal care objectives and demonstrate genuine respect and concern for animals and their proper care. Any associate 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's premises, including animals offered for adoption and sale; those visiting PETCO for grooming, photographs, veterinary care, and obedience training; and those that are on Company premises for any other reason. Where appropriate, PETCO may refer such matters for criminal prosecution.

I am interested in earning an Aquatic Life, Avian, Small Animal or Reptile care certification. What should I do?

Tell you supervisor about your interest or contact your HR representative to get more information on PETCO's training programs.

Animal Care Education

PETCO dedicates significant resources to educating associates in proper animal care and handling. Upon hire, each new PETCO associate with animal care responsibilities receives award-winning training in animal care that has been reviewed and approved by a panel of veterinarians. All training programs are followed by a comprehensive exam that associates must pass. PETCO also offers associates the opportunity to earn certification in Aquatic Life, Avian, Small Animal, or Reptile care through supplemental training programs.

In our commitment to promoting the welfare of companion animals, PETCO provides customers with Care Sheets that outline basic animal care information, including the type and size of habitat

recommended for the animal, and the animal's social, nutritional, and exercise needs. Each Care Sheet assists customers in choosing a pet by encouraging potential pet parents to ask themselves, "Is this animal right for me?" In an effort to support pet parents throughout the lives of their companion animals, we also encourage them to review other references on animal care, including books and online references.

Ultimately, the success of all of PETCO's animal care education efforts relies on the everyday actions of our people to make it happen. As such, PETCO associates are expected to actively expand and share their knowledge of animal care with other associates and most importantly with customers.

Vendor Certification Program

All PETCO 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 certification process. Associates 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.

In addition to these industry-leading commitments, PETCO is actively engaged in efforts to increase the availability of captive bred animals. PETCO recognizes that buying captive bred animals helps to maintain wild populations and is striving toward the goal of sourcing all of its animals from captive bred sources.

Pet Adoptions

Reflecting our care and concern for animals, PETCO is committed to the "Think Adoption First" philosophy. PETCO does not sell dogs or cats, and for almost 40 years has worked with qualified local humane organizations in our stores' communities to find homes for homeless animals. We invite qualified organizations to hold mobile adoption events in our stores or maintain stationary adoption sites in select store locations. Adoption events and stationary adoption sites help local communities reduce the number of homeless pets that are euthanized each year. Consistent with this philosophy, associates are expected to encourage customers to consider adoption as the first option when adding a new companion animal to their family.

PETCO is also committed to the principle that any customer who purchases an animal at PETCO, and finds they are unable to care for that animal, may return the animal with the assurance that the

How can I support the "Think Adoption First" philosophy?

The most important thing associates can do to support this philosophy is to encourage customers to consider adoption as the first option when adding a new companion animal to their homes.

animal will be placed with a new pet parent and receive all necessary care.

External Partnerships

PETCO partners with hundreds of non-profit animal welfare organizations to pursue mutual goals of promoting compassion toward, and humane treatment of, animals. We are a strong supporter of groups that demonstrate advocacy for animals consistent with PETCO's animal care philosophies.

Another industry-leading initiative adopted by PETCO was the establishment of an independent Animal Care Advisory Council of world renowned experts in veterinary medicine, animal behavior, animal welfare, and animal ethics. The Council provides independent expert input on PETCO products, habitats and animal care policies. We believe 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 constantly review our policies and 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 an independent 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. Finally, it is PETCO's policy that only licensed veterinarians may perform euthanasia on animals other than fish.

PETCO Foundation

PETCO was founded in 1965 on the principle of "connecting with the community." This philosophy has allowed us to become productive partners with the many humane groups we assist and support nationwide. The PETCO Foundation was established in February 1999 to allow us to promote charitable, educational, and other philanthropic activities for the betterment of animals everywhere. The PETCO Foundation is dedicated to serving the "Four R's" – Reduce, Rescue, Rehabilitate, Rejoice.

How does PETCO handle sick animals? Is veterinary care available?

PETCO has established relationships with local veterinarians across the country to ensure that each store has an independent 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.

The PETCO Foundation is dedicated to serving the "Four R's":

- ***Reduce***
- ***Rescue***
- ***Rehabilitate***
- ***Rejoice***

All associates 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.

DEALING WITH CUSTOMERS AND OTHERS

May I use Customer Information for personal reasons?

No! Associates may never use Customer Information for personal reasons or for any reason other than the reason for which the customer provided the information.

A customer wants to buy a brand of dog food that is on sale. Should I try to sell the customer other food that has a larger profit margin?

PETCO does not condone "high pressure" sales techniques. The ultimate decision about which product to buy should be made by the customer. Honestly explaining the features and benefits of our merchandise without pressure allows customers to make decisions about which merchandise to buy.

PETCO creates a fun and exciting shopping experience for customers and their pets by offering a complete, competitively-priced selection of pet-related 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 associates to comply with all administrative, technical and physical safeguards PETCO has implemented to protect customer 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" information under the four tier information classification system adopted by PETCO. For more details on how to properly handle Confidential information, please refer to the paragraph in this document titled "Information Security" and to associated policies. Associates may never use customer information for personal reasons or for any reason other than the reason for which the customer provided the information. Associates are required to immediately report any suspected or actual failure to protect customer information to a supervisor, the Chief Information Security Officer (via email at CISO@petco.com) or to PETCO's Hotline.

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 honestly with each customer and clearly explain the purpose and benefits of our products and services. Each associate 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, associates should seek help from another knowledgeable associate or a member of management. Consistent with PETCO's Animals Always Come First philosophy, PETCO reserves the right to refuse

What should I do if a Customer requests their own P.A.L.S. information?

Refer the customer to PETCO's Customer Service department at 1-888-824-P.A.L.S. or 1-888-824-7257.

One of our regular vendors has a new product I think our customers will like. The vendor told me PETCO could have an exclusive on the product for one year if PETCO prices the item per their guidelines. Should I allow the vendor to set PETCO's pricing structure on this item?

No. PETCO makes its own business decisions about pricing. To do otherwise has the potential to become an unfair business practice and may be illegal.

to sell an animal to customers who appear unable or unwilling to provide proper care to that animal.

Our Advertising Practices

PETCO's advertising practices show the ways that our products and services strengthen the bonds between people and animals. Advertising practices may include packaging, product press releases, brochures, and most other forms of product communication in addition to television, print, and radio advertising. All statements of fact included in advertisements must be true and must be substantiated. Advertisements must be clear and cannot be misleading, even if literally true. Any additional information that may be required to ensure that an advertisement is not misleading (e.g., disclaimer) must be communicated clearly and conspicuously. All associates who create advertising, marketing, and related materials must comply with PETCO policies, including prior approval from the Advertising Department at the NSC.

Our Pricing Practices

PETCO makes its own pricing decisions without influence from vendors, contractors, or competitors. To do otherwise may violate federal and state antitrust laws and is strictly forbidden.

Our Buying Practices

Associates who make the decisions to buy products and supplies, or who contract services for PETCO, must make informed decisions. We are obligated to contract with vendors who supply products and services that are high quality, safe, and conform to all applicable laws.

Consultants

PETCO's agreements with agents, representatives, and consultants shall clearly set forth the services to be performed, the basis for earning the fee involved, and all other terms and conditions. Payments must be reasonable in amount and bear a reasonable relationship to the value of the services rendered. We will not knowingly permit representatives, agents, and consultants to take actions on behalf of PETCO that would be in violation of this Code of Ethics.

CONDUCT WHILE AT WORK

Sexual Harassment

The leadership of PETCO takes the matter of courtesy, dignity, and respect among associates very seriously. We will not permit any associate to be sexually harassed or to be made to feel

My supervisor has asked me out on a date three different times over the past two weeks. Each time I say "No" and that I'm not interested, but I don't think my supervisor gets it. What should I do?

You should notify your supervisor's manager, contact Human Resources, or call the PETCO Hotline and seek assistance in resolving the matter. There will be no retaliation for informing someone about the issues that you may have with your supervisor.

uncomfortable by another associate. Sexual harassment can be defined as:

- Submission to the conduct is made either implicitly or explicitly a term or condition of an individual's employment, or
- Submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting the individual, or
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an offensive, intimidating, or hostile working environment. Inappropriate conduct may include things such as unwelcome advances, conduct, gestures, physical contact, speech, or acts of a sexual or suggestive nature.

Other Harassment

PETCO will not tolerate harassment or discrimination of any sort, including harassment based on sex, age, race, color, creed, religion, national origin, physical or mental disability, sexual orientation, or veteran status.

Asset Protection

Protecting PETCO's assets is every associate's responsibility. Loss of assets may be caused by many factors, including theft of merchandise, supplies, or funds; fraudulent use of customer or associate information (including, but not limited to credit/debit card information), benefits, or insurance; 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 an obligation to report it. Further, every associate is obligated to fully cooperate in any investigation by PETCO relating to the protection of Company assets.

Drug and Alcohol Abuse

PETCO strictly prohibits working while under the influence of alcohol, non-prescribed drugs, or any other intoxicating or mind-altering substance, including prescribed drugs that have a debilitating effect on an individual's performance. This policy applies to all associates while working either on or off PETCO's premises, while driving a Company vehicle, and while driving on Company business. Every associate is ultimately responsible and accountable for his or her alcohol and drug use or abuse and the actions arising from such use. Alcohol may be served at special events sponsored by PETCO. When alcohol is available, associates who choose to drink alcohol must do so in a responsible

A co-worker constantly talks about guns and weapons while at work, and asked me if I wanted to go to this co-worker's car to see them. What should I do?

You should decline the invitation to see the guns and immediately notify your supervisor of the conversation. PETCO prohibits possession of any kind of weapon on company property, including those inside personal automobiles parked on PETCO property.

manner and must not become intoxicated. Under no circumstances will minors be served alcohol.

Violence in the Workplace

PETCO is firmly committed to providing a workplace that is free from acts and threats of violence. We have implemented measures that aim to increase associate, vendor, and customer protection with a goal of providing everyone with a secure working environment. Our policy strictly prohibits any associate from threatening to commit or from committing any act of violence while in the workplace, while on Company-related business, or while operating any vehicle or equipment owned or leased by PETCO. We also prohibit possessing any kind of weapon on PETCO property, which includes those in personal automobiles parked on PETCO property. Associates must immediately report any threats, acts of violence, or possession of weapons to their supervisor, Human Resources, Asset Protection or the PETCO Hotline.

CONFLICTS OF INTEREST

I have experience setting up aquariums and want to offer my independent services to PETCO customers. Is that allowed?

No, PETCO associates must refer all aquatic services customers to the company designated by PETCO. It would be a conflict of interest for an associate to solicit business from PETCO customers for his or her gain, or to refer customers to anyone other than the company(s) designated by PETCO. Associates should discuss any related concerns they may have with their direct supervisor, their Human Resources Representative or by calling the PETCO Hotline.

Associates 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, associates are expected to avoid both actual and apparent conflicts.

The term "conflict of interest" refers to situations in which financial or other personal benefits may compromise, or have the appearance of compromising, an associate's professional judgment. Conflicts of interest have the potential to directly or indirectly bias many activities and aspects of professional behavior, particularly when associates are in a position to set policies, manage processes, interact with customers and vendors, or when they are in a position of authority.

If it appears that there is an actual, apparent or potential conflict of interest, PETCO will attempt to work with the affected associate to resolve the conflict concern. 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.

Acceptance of Gifts or Gratuities

PETCO wishes to remain fair, impartial and unbiased in its business decisions and wishes to avoid even the appearance that outside parties could gain a business advantage by sending gifts or gratuities to our associates. Accordingly, PETCO personnel are not

A vendor has given me a gift, can I keep it?

With approval from a member of management associates may be allowed to keep gifts with a reasonable retail value of \$10 or less. For example, a t-shirt, pen, hat, mug, or keychain with a vendor's name or logo would generally have a retail value of ten dollars or less.

Gifts worth more than \$10 that cannot be politely declined must be turned-in or reported to the gratuity contact for your location to determine appropriate distribution through a raffle at a company function or other suitable means (such as donation to a charitable organization).

allowed to solicit or accept gifts or gratuities from vendors, potential vendors, brokers, consultants, attorneys or other third parties that may do business with PETCO. There are a limited number of exceptions to this policy. For example, with approval from a member of management, vendors or other third parties may occasionally be permitted to give associates gifts or gratuities of nominal value. A gift or gratuity is considered to be of nominal value if it has a reasonable retail value of ten dollars (\$10) or less.

If a gift or gratuity is received that exceeds the nominal value limit (i.e. reasonable retail value of \$10 or less), and it is not possible to politely decline the gift, associates must notify the gratuity contact for their location to determine appropriate distribution through a raffle at a company or other suitable means (such as donation to a charitable organization).

Gratuity Points of Contact

- **NSC** – Internal Audit Department, Ethics & Compliance Area
- **Regional Offices** – Vice President of Operations
- **Stores** – District/Area Manager
- **Distribution Centers** – DC Director/Manager

For additional information regarding gifts or gratuities associates should refer to PETCO's Gift/Gratuity policy or contact the gratuity point of contact for their location.

Travel/Lodging/Events/Entertainment

All travel, lodging, events, and entertainment offered by vendors, (including current vendors, potential vendors, brokers, consultants, attorneys or other third parties that may do business with PETCO) to managers and above must receive pre-approval from the Ethics and Compliance area in the Internal Audit department and the associate's supervisor (VP level or above). For additional information regarding vendor sponsored travel, lodging, events and entertainment, associates should refer to PETCO's Travel and Expense Guidelines.

Buying Merchandise and Other Tangible Property from or Obtaining Services from Vendors for Personal Use

With the approval of the Ethics and Compliance area in the Internal Audit department, associates may purchase items not sold in PETCO stores or obtain services from vendors at a price that is reasonable and no less than the vendor's normal cost. Such purchases should be infrequent, and are generally discouraged and must be made at no cost to the Company.

I own stock in a PETCO competitor. Do I have to disclose this to anyone?

Yes, you should notify the Ethics & Compliance area in the Internal Audit department of any investments you may have in PETCO vendors or competitors.

PETCO strongly discourages romantic or sexual relationships between co-workers and strictly prohibits such fraternization between supervisors and anyone they directly or indirectly supervise or who is in their chain of command.

Employment with Others

Associates 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 supervisor or our Human Resources representative prior to taking any action.

Investing in Vendors or Competitors

No associate or immediate family shall directly or indirectly invest in, lend money to, or borrow money from any company with whom PETCO does business or directly competes, except in the normal course of their personal business, without prior approval from the Ethics and Compliance area in the Internal Audit department. Associates must report any current investments and/or loans with vendors or competitors to the Ethics and Compliance area in the Internal Audit department, who, together with the associate, will make decisions regarding disposal of such investments. For the purposes of this paragraph, 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 associate derives any benefit from such investment.

Workplace Relationships (Fraternization)

PETCO believes that fraternization (such as dating or other types of repetitive socializing outside the normal business relationship) between associates and supervisors, or between management personnel where there is a direct or indirect reporting relationship, puts undue pressure on the working relationship. PETCO strongly discourages romantic or sexual relationships between co-workers and strictly prohibits such fraternization between supervisors and anyone they directly or indirectly supervise or who is in their chain-of-command. Associates whose relationships are prohibited or may be considered questionable must notify their supervisor(s) of the relationship. PETCO will review the situation and work with the associates to take reasonable action to reduce the negative impact such relationships can have on the Company, the associates in the relationships, and their co-workers. Associates who fail to disclose such relationships may be subject to disciplinary action, up to and including separation.

Associate Discounts

PETCO associates are entitled to discounts on the purchase of certain products and services available in PETCO stores. Only PETCO associates and immediate family members living in the same household are entitled to associate discounts.

Outside Interests

It is not the intention of PETCO to restrict any associate from any legal activity outside the workplace, such as political, religious, nonprofit, 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 or the PETCO Foundation.

Non-Disparagement of PETCO

It is inappropriate for associates to publicly make negative remarks about PETCO. Associates are therefore expected to refrain from making any negative comments about PETCO to any third party and must not otherwise disparage either PETCO's reputation as a company or the reputations of its officers, directors, associates, or vendors. Associates are expected to refrain from any conduct that may negatively impact PETCO. If you have a grievance or concern, you should work within the Company to obtain a resolution. (Nothing in this section is intended to limit the rights of whistleblowers acting within the scope of applicable laws.)

Post-Separation Responsibility

In consideration of your employment or continued employment by PETCO, the compensation now, and hereafter paid to you, and the training you have received and/or will receive during the course of your employment, associates agree to adhere to certain responsibilities. For a period of six months immediately after the termination of your employment with PETCO for any reason, you agree not to interfere with PETCO's business by directly or indirectly, on behalf of yourself or any other person or entity, solicit the business of any persons or entities who were the customers of PETCO while you were employed by PETCO, or solicit an associate of the Company to terminate his or her employment. Your obligation to keep Company trade secrets and other proprietary information in strict confidence continues both during your employment and forever following your separation from employment. You also understand that, except where otherwise contractually agreed to, you may compete with PETCO following your separation. However, you are not permitted to use confidential or proprietary information to compete with PETCO or to engage in acts that would constitute unfair competition, or to disclose or use trade secrets or other proprietary information in violation of applicable laws.

COMPANY PROPERTY AND RECORDS

No false or misleading entries shall be made in the books and records of the Company for any reason, and no associate shall engage in any arrangement that results in any transaction or act prohibited by this Code of Ethics.

Accurate Records

All assets, liabilities, expenses, and other transactions shall be recorded in PETCO's regular books of account. No undisclosed or unrecorded fund or asset of PETCO and its subsidiaries shall be established or maintained for any purpose. Documentation of all business transactions shall describe the pertinent events. No false or misleading entries shall be made in the books and records of the Company for any reason, and no associate shall engage in any arrangement that results in any transaction or act prohibited by this Code of Ethics. No payment shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documentation supporting the payment.

Information Security

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, and 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:

- **Highly Restricted Information** – tightly restricted to specific individuals; copies must be secured at all times and properly destroyed (i.e., shredded, erased, etc.). For example Highly Restricted Information includes, but is not limited to, merger or acquisition information or other extremely sensitive information.
- **Confidential Information** – limited to certain specific groups of individuals within PETCO; again, copies must be secured at all times and properly destroyed. For example, Confidential Information includes, but is not limited to, customer information, sales information, budget information, forecasts, store listings, construction reports, open/close store reports, real estate pending transaction lists and the PETCO phone directory.
- **Internal Information** – limited to individuals within PETCO with a legitimate business need for the information; copies must be secured when off site and properly destroyed. For example Internal Information includes, but is not limited to,

What are some basic things I can do to protect PETCO's business information?

A good general 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.

general business information that is not specifically labeled as Highly Restricted, Confidential or Public.

- **Public Information** – intended for internal or external use; copies may be discarded without special precautions. Public Information includes, but is not limited to, press releases and weekly advertisements that have already been published.

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 information you receive or about the correct use of that information, ask your supervisor for direction or contact the Chief Information Security Officer via email at CISO@petco.com.

May I make personal copies on a PETCO copier? May I access the Internet for personal use from a company location?

You may use Company telephones, fax machines, and copiers infrequently for personal reasons, if it is legal and does not interfere with your job responsibilities.

Occasional, limited use of the Internet is permitted. However, it must not interfere with your responsibilities and must never involve illegal or inappropriate activities.

No associate, either during or after employment with PETCO, may use or disclose any Highly Restricted, Confidential or Internal information relating to PETCO, or PETCO’s suppliers, vendors, or customers, regardless of the source of such information or the method of its acquisition, in any unauthorized manner.

Use of Company Property

All PETCO property and information systems are primarily intended for conducting Company business. Occasional personal use of computer resources and telephones is permitted, as long as it does not interfere with or impede PETCO’s business. Personal use of Company property must comply with PETCO’s Policies and Procedures and must be promptly discontinued if requested by management. Knowingly duplicating copyrighted computer software is prohibited. When in doubt, associates should receive written approval from their supervisor prior to using PETCO property or systems for personal use. PETCO reserves the right to access, search, review, and copy all information, including information or items that the associate may consider personal, that is located on PETCO equipment.

COMPLYING WITH THE LAW

All PETCO associates 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 and shall observe the highest standards of ethics. The use of PETCO funds, services, or assets for any unlawful or improper purpose is strictly prohibited. No individual shall engage, on behalf of PETCO, in the practice of purchasing privileges or special benefits through the payment of bribes, gratuities, or other forms of payoff. No individual shall accept payments from domestic or foreign companies in violation of any law.

Financial and Accounting Rules

A strong reputation is difficult to gain, but easy to lose. As a publicly traded company that is owned by investors PETCO must meet rigorous regulations and prepare accurate and detailed public reports about our Company's performance. There are many important federal, state, and local laws that govern how we handle the financial reporting of our business, including: the Sarbanes-Oxley Act (SOX), Federal Sentencing Guidelines, the Fair Credit Reporting Act, the Fair Debt Collection Act, accounting guidelines such as generally accepted accounting principles (GAAP), standards promulgated by the Financial Accounting Standards Board (FASB), and SEC rules/regulations.

Every associate at PETCO has a responsibility not only to act with integrity in handling information that leads to financial reporting, but also to take action when they see something that may be wrong or improper regarding any aspect of our business.

Internal Controls and Procedures

An important element in safeguarding PETCO's good reputation involves adhering to our internal controls and procedures. These internal controls and procedures are designed to ensure that our financial records are accurately and completely maintained. Adherence to these internal controls and procedures is required at all times.

Insider Trading: Purchase and Sale of Company Stock

It is against PETCO policy for associates to buy or sell PETCO stock while in possession of important information not publicly available. Securities laws impose a significant risk of liability on any associate who, while having access to important information about PETCO that is not generally available to the public, purchases or sells PETCO stock or recommends trading to others. Many associates have access to confidential corporate information. This does not mean that associates may never buy or sell PETCO stock, but it does mean that the exercise of judgment is required. Our insider trading policy provides information on the purchase and sale of Company stock that must be adhered to at all times. Certain associates, as described in the policy, are required to obtain pre-clearance prior to any trading of PETCO stock. The policy prohibits trading "put and call" options (or any similar type instruments) in our stock at any time. There is a danger that such short-term trading could be construed as trading on inside information. Associates who are unclear about whether the policy applies in a certain situation may always seek guidance from the senior management in the Finance department.

If I discover a serious, unsafe condition, what should I do?

No associate is expected to do work that is reasonably perceived as dangerous to health or safety if the danger is not corrected by training and/or equipment adjustments. If you have a safety concern, immediately report your concern to your supervisor for evaluation and correction.

I'm an hourly associate, and I didn't remember to clock in until 30 minutes after I starting working. Can I ask another associate to clock me out 30 minutes after I leave so the total time worked is correct?

No. Your time card is a legal document and must accurately reflect all hours that you worked, including when you clocked in and out during the day. You should ask your supervisor to correct your time card to accurately reflect your arrival time.

Workplace Safety

Maintaining the safety of PETCO's associates and customers is an important responsibility. PETCO's policy is to comply with all federal and state safety laws and regulations, all applicable OSHA requirements, and all PETCO safety Policies and Procedures. All associates must follow safe work procedures, use appropriate safety and protective equipment, and always be alert to potential injury to themselves, animals, and others. Associates must observe all security procedures and use all established security equipment. Associates must immediately report any conditions they believe to be unsafe, unhealthy, or potentially dangerous to their supervisors. Associates must also be aware of and follow appropriate ergonomic precautions to avoid repetitive stress injuries.

Wage and Hour Laws

All associates, including management, must adhere to all applicable federal, state, and local wage and hour laws. Associates are expected to report any wage and hour violations immediately to their immediate supervisors, their Human Resources representatives, or Human Resources at the NSC.

Exempt Associates

Certain PETCO associates have been classified as "exempt." Because of the managerial, administrative, and/or professional nature of some associates' job duties, they are exempt from certain state and federal labor laws, including those requiring payment of overtime. Exempt associates are sometimes also referred to as "salaried." We expect exempt associates to spend the majority of their time performing exempt duties, such as managing associates and/or the business of PETCO, and not performing clerical functions and the tasks normally performed by non-salaried associates. Upon hire and as requested, Human Resources will provide a summary description of exempt duties applicable to your position. Associates classified as "exempt" must inform their supervisors or Human Resources at the NSC any time their duties are primarily (51% or more) non-exempt in nature, so that (if possible) their job duties can be restructured as necessary to qualify for exempt status or they can be properly classified under the law.

Reporting Time Worked

All associates are responsible for maintaining and reporting (when required) an accurate accounting of hours worked. It is illegal and against PETCO policy to allow or require any associate to work "off the clock" or falsify hours worked.

Environmental Protection

PETCO respects the environment and strives to conserve natural resources as much as possible while operating our business. Our associates are expected to use all resources appropriately and efficiently and make every effort possible to protect our environment. Associates must dispose of waste in accordance with all applicable laws.

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.

Payments to Government Personnel

No payment shall be made to any government representative, directly or indirectly, to obtain favorable action from a government agency or for any other reason that could be construed as unethical, unprofessional, or illegal. Gifts or services to, or lavish entertainment of, government personnel are prohibited since they can be construed as attempts to influence government decisions in matters affecting PETCO.

FOR MANAGERS AND SUPERVISORS

Professional Conduct

Associates are personally accountable for their actions and must ensure that they maintain the highest level of intellectual honesty and personal integrity in their daily responsibilities. Examples of conduct considered to violate this standard include but are not limited to:

- Knowingly issuing or approving a report or document that contains incorrect or misstated data.
- Knowingly receiving shipments of supplies or merchandise that are not charged to your location.
- Falsifying records by deliberately violating PETCO Policies or Procedures.
- Deliberately disregarding Policies or Procedures in order to improve a result, regardless of whether or not the effect is positive or negative upon PETCO.

Obviously, a policy statement cannot cover all situations. Good judgment coupled with a high sense of personal integrity is the best policy. When situations arise that appear to fall into “gray areas,” it is best to consult with your immediate supervisor or Human Resources.

When situations arise that appear to fall into “gray areas,” it is best to consult with your supervisor or Human Resources Representative.

A local news station wants to interview me about our support of a local community activity in connection with PETCO Foundation. Can I participate in the interview?

Before participating in any interviews with a member of the media, you must contact your supervisor and the Communications department at the NSC. They will give you appropriate support and guidance on how to interact effectively with the media.

All PETCO management is responsible for the enforcement of and compliance with this Code of Ethics.

Respect in Employment Decisions

PETCO's management team plays a key part in enforcing the Code of Ethics and acting as role models. This is especially true during employment decisions such as hiring, placement, promotion, layoff, transfer, demotion, separation, training, pay, recruitment advertising, and other forms of compensation, and general treatment during employment.

Dealing with the Media

The news media may ask associates for information or statements regarding PETCO related activities or events. We want to work with the media to ensure that information is provided accurately. If the news media contacts you, immediately alert your supervisor and the NSC Communications Department to discuss the situation. Together, all parties will determine the appropriate PETCO spokesperson and provide guidance about how to interact effectively with the media.

Government Agencies

PETCO may be visited by government agencies inquiring about our business. Our policy is to fully cooperate with visitors and escort them around the business as appropriate. When requested, we will provide information to the agency that is appropriate, lawfully requested, and relevant to the inquiry of the agency. Associates who are contacted by a visiting government agency representative should request to see appropriate identification and immediately notify their supervisor of the visit. Associates should seek direction from their supervisor or the NSC about how to comply with requests from the agency before releasing any requested data.

Contract Negotiations

Associates representing PETCO in the negotiations of a contract for goods or services should be fair and honest with all parties involved. At no time may an associate submit or knowingly accept false or misleading information, documents, or proposals.

Management Responsibility

All PETCO management is responsible for the enforcement of and compliance with this Code of Ethics. Such responsibilities include, but are not limited to, the periodic distribution and review of this Code of Ethics with associates under management supervision to ensure understanding and compliance.

Responding to Concerns Reported through the Chain-of-Command

When an associate has an ethics or compliance concern, they are encouraged to first seek assistance from their direct supervisor. This means that managers and supervisors are responsible for responding to such concerns in a complete and timely manner. When responding to an ethics or compliance concern **first seek assistance from your local support team**, including your:

- o General Manager
- o District/Area Manager
- o Reg. Companion Animal Coord.
- o Reg. HR Rep or Director
- o Reg. Mgr. of Asset Protection
- o Director or VP Over Your Area

Managers and supervisors are encouraged to keep the contact information for their local support team readily available so that you may quickly contact them for support when you receive an ethics or compliance concern. A space has been provided behind the front cover of the Code of Ethics to keep this information handy.

If an ethics or compliance concern cannot be resolved through your local support team, then managers and supervisors should seek additional assistance through one of the following avenues:

PETCO Hotline	1-888-736-9834	<u>ethics@petco.com</u>
Internal Audit	1-858-453-7845 x3790	<u>auditexec@petco.com</u>
Law Dept	1-858-453-7845 x3791	<u>law@petco.com</u>

While the majority of ethics and compliance issues can be resolved locally, there are certain types of concerns that you must immediately elevate using a “*get company*” approach. This means that whenever a concern is raised regarding any of the issues listed below you are required to inform at least two (2) other authorities of the report within two (2) business days of receipt. This “*get company*” approach is designed to assure that sufficient resources are assembled to support a timely investigation and response for issues that typically require NSC involvement.

“Get Company” by Contacting Two Authorities within Two Business Days For Any of the Following Concerns:

- | | |
|-----------------------------------|--------------------------------------|
| o Accounting/Audit Irregularities | o Insider Trading |
| o Conflicts of Interest | o Kickbacks |
| o Falsification of Records | o Product Quality Concerns |
| o Fraud | o Release of Proprietary Info |
| o Fraudulent Insurance Claims | o Retaliation Against Whistleblowers |
| o Improper Loans to Executives | o Safety & Sanitation Issues |

“Get Company” Contacts:

PETCO Hotline	1-888-736-9834	<u>ethics@petco.com</u>
Internal Audit	1-858-453-7845 x3790	<u>auditexec@petco.com</u>
Law Dept	1-858-453-7845 x3791	<u>law@petco.com</u>

WHAT TO DO WHEN YOU HAVE AN ETHICS OR COMPLIANCE CONCERN OR QUESTION

What to Do When You Have a Question or Concern

**First,
Talk to Your Direct
Supervisor...**

**Then
Talk to Person Above
Your Supervisor...**

**Then Talk to Your
Local Support Team:**

- o General Mgr
- o District/Area Mgr
- o Reg Companion Animal Coord
- o Regional HR Rep or Director
- o Regional Mgr of Asset Protection
- o Director or VP Over Your Area

Finally, if you are not comfortable seeking assistance through your local support teams, or feel you have not received adequate assistance, then call the PETCO Hotline at 1-888-736-9834.

Sometimes it is difficult to know the right thing to do. Following are some questions that you should ask yourself when deciding if you made (or are making) the right decision. If you can answer “Yes” to all the questions, then your decision is probably a good decision. If you answer “No” or “I don’t know” to any one of the questions, seek guidance from your supervisor or call the PETCO Hotline.

- Will my actions be ethical in every respect and fully comply with the law and with PETCO’s policies?
- Will my actions avoid the appearance of impropriety?
- Will others view my actions as fair and honest?
- Will I feel good about myself afterwards?
- Would my supervisor, other associates, customers, family, and the general public approve of my actions?

If you are not sure about a “Yes” answer to any of those questions, there are several ways to get help in making an ethical decision.

Associates should feel free to ask questions about what is right and possibly wrong without fear. Associates who are challenged with a tough ethical question, or are not sure about what action to take, are encouraged and empowered to resolve those issues through their normal chain-of-command.

This means associates should first seek assistance from their direct supervisor. If an associate is not comfortable seeking assistance from their direct supervisor, or feels that they are not receiving adequate assistance, they should seek assistance from the person above their supervisor.

If an associate is not comfortable working through their normal chain-of-command, or feels they are not receiving adequate assistance, they should contact their local support team including their:

- o **General Manager**
- o **District/Area Manager**
- o **Regional Companion Animal Coordinator**
- o **Regional Human Resources Representative or Director**
- o **Regional Manager of Asset Protection**
- o **Director or Vice President over your area**

Associates should keep the contact information for their local support team readily available so that they may quickly contact

them for support. A space has been provided behind the front cover of the Code of Ethics to keep this information handy.

Finally, if an associate is not comfortable seeking assistance through any of these avenues, or feels they are not receiving adequate assistance, they should call the PETCO Hotline at 1-888-736-9834.

REPORTING ETHICS OR COMPLIANCE VIOLATIONS

A co-worker told me that his supervisor told him to do something that was clearly unethical but I wasn't involved. Do I have an obligation to call the PETCO Hotline?

If you believe that your co-worker was telling the truth, you should call the PETCO Hotline. We rely on conscientious associates to inform the Company when there may be a potential issue.

PETCO has established a Hotline associates may call to report ethics or compliance concerns that they are not able to resolve through their normal chain-of-command or through their Human Resources representative. The PETCO Hotline is confidential and available 24 hours a day, 7 days a week. Calls to the PETCO Hotline can be anonymous. We understand that an associate 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, we encourage associates to identify themselves when voicing their concerns without fear of retaliation.

PETCO Hotline 1-888-736-9834 ethics@petco.com

Associates may also contact the either of the following to report an ethics or compliance violation:

Internal Audit 1-858-453-7845 x3790 auditexec@petco.com

Law Dept 1-858-453-7845 x3791 law@petco.com

WHAT HAPPENS WHEN YOU REPORT AN ETHICS OR COMPLIANCE CONCERN?

PETCO is committed to fully investigating all reported ethics and compliance concerns and we appreciate it when associates bring such concerns to our attention. When making a report, associates 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. The case manager is responsible for assigning the report to an investigator, and for overseeing the investigation.

Ethics and compliance investigations typically take at least fourteen days to complete and may often take longer. While we try to complete each investigation as quickly as possible, we would rather

take additional time to fully develop facts rather than quickly close out an investigation in order to meet an arbitrary turnaround time. That said, we ask associates who make reports for their patience as each investigation is conducted.

Finally, it is important to remember that many times the specific results of an investigation will not be made public, even with the person who initiated the report. For example, investigations that result in certain confidential actions, such as disciplinary measures, cannot be publicly shared due to privacy regulations.

ENFORCEMENT

All reports of known or suspected violations of the law or of this Code of Ethics will be handled sensitively and with discretion. Your supervisor, the Ethics and Compliance Committee, and PETCO will protect your confidentiality to the extent possible, consistent with the law and the Company's need to investigate your concern. PETCO prohibits retaliation against an associate who seeks help in good faith or reports known or suspected violations. Any associate who ignores or violates this Code of Ethics and any supervisor who penalizes a subordinate for following these ethical standards will be subject to disciplinary action, including immediate separation. However, it is not the threat of discipline that should govern your actions. We hope you share our belief that a dedicated commitment to ethical behavior is the right thing to do for yourself and for PETCO.

Condition of Employment

All associates must accept and adhere to this Code of Ethics and all related Policies and Procedures as a condition of employment with PETCO. Failure to accept or adhere to this Code of Ethics and the corresponding Policies and Procedures may result in disciplinary action, up to and including separation from employment. Associates involved in any alleged violation of the Code of Ethics or related Policies and Procedures will be given an opportunity to present their version of events prior to disciplinary action. Violations of this Code of Ethics may subject associates to legal proceedings to recover the amount of any improper expenditures or losses, or to stop unlawful behavior, and may also result in criminal prosecution.

Employment at Will

This Code of Ethics and the matters contained herein are neither a contract of employment nor a guarantee of continuing PETCO policy. We reserve the right to amend, supplement, or discontinue the Code of Ethics and the matters addressed herein without prior notice, at any time.

Waivers

Waivers of this Code of Ethics may only be granted under extraordinary circumstances. Only the Nominating and Corporate Governance Committee of the Board of Directors may grant waivers of this Code of Ethics relating to PETCO Board members, executive officers, or other principal financial officers and such waivers will be disclosed to the public as required by law or by the rules of the NASDAQ National Market. Only the Ethics and Compliance Committee may grant waivers relating to other associates.

Satisfaction of SEC Requirements

This Code of Ethics, as applied to PETCO's principal financial officers, shall be PETCO's "code of ethics" as defined in Section 406 of the Sarbanes-Oxley Act of 2002 and SEC rules.

THE ETHICS AND COMPLIANCE COMMITTEE

PETCO's Ethics and Compliance Committee oversees our efforts to promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law. The Ethics and Compliance Committee is comprised of high level personnel, including executive management and reports to PETCO's Board of Directors. In all of its activities, the Ethics and Compliance Committee considers PETCO's mission and values as an integral elements in its oversight and decision making functions. For more information regarding the Ethics and Compliance Committee, please contact the Ethics and Compliance Manager using the email address listed below.



Attn: Ethics and Compliance Manager
PETCO Code of Ethics
9125 Rehco Road
San Diego, CA 92121
Email: ethics@petco.com
Hotline: 1-888-736-9834

