



C.A.F.E. Practices Verification Organization Approval Procedure

Starbucks Coffee Company

V2.1

English Version

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1.0 Introduction

Starbucks Coffee Company (hereafter referred to as Starbucks) initiated C.A.F.E. (Coffee and Farmer Equity) Practices in 2004 to evaluate, recognize, and reward producers of high-quality sustainably grown coffee. This is achieved through third-party verification of C.A.F.E. Practices eligible suppliers to evaluate the level of compliance with the sustainability indicators defined within the “C.A.F.E. Practices Generic and Smallholder Scorecards”.

To ensure the quality and consistency of auditing and reporting in the C.A.F.E. Practices program, Starbucks has contracted SCS Global Services (hereafter referred to as SCS) as an independent third-party organization responsible for the initial approval and ongoing monitoring of all verification organizations wishing to conduct verification work in C.A.F.E. Practices. An independently administered approval process serves as an impartial way of evaluating an organization’s capabilities and resources to conduct verification work to ensure that all approved verification organizations provide excellent service to Starbucks coffee suppliers. Only C.A.F.E. Practices verifications conducted by verification organizations approved by SCS will be recognized as valid by Starbucks.

The “Verification Organization Approval Procedure”, as detailed in this document, establishes the requirements necessary for interested parties to become approved verification organizations. The approval procedure is detailed in Section 3.0.

Before completing and submitting an application form to SCS, all interested parties should review this document, as well as the “C.A.F.E. Practices Verifier and Inspector Operations Manual”, Generic Evaluation Guidelines”, and the “C.A.F.E. Practices Generic and Smallholder Scorecards” to confirm that the prospective organization is able to meet the specified requirements.

Independent

Verification organizations, verifiers, and their inspectors must not hold a financial interest in, be presently associated with, or have been employed by the entities they are verifying, without disclosing and describing the nature of such affiliations to SCS, to avoid any potential for a conflict of interest. If this information is disclosed to SCS, appropriate measures may be developed by the applicant organization to mitigate a potential conflict of interest. If the applicant chooses to withhold this information or refuses to acknowledge the potential for a conflict of interest, SCS may elect to deny the applicant provisionally approved status regardless of whether they have met all other requirements for provisional approval.

SCS will review verification organization independence in the course of annual office audits and it is expected that all personnel working for the verification organization on C.A.F.E. Practices verification work will sign declarations stating any affiliations that may be a conflict of interest. Verification organizations must also disclose on an annual basis any second party services (pre-assessment or consulting services) provided to any clients and describe the processes employed to maintain third party independence for the purposes of C.A.F.E. Practices.

Capable

Verification organizations must demonstrate to SCS that their organizational capabilities are sufficient to conduct internal report review and training, and provide the logistical support (i.e. computer and internet capabilities, telecommunications, reliable transportation, GPS units, etc.) required to conduct inspections. Moreover, it must be demonstrated to SCS that all staff possess the skill and integrity to faithfully assess and report on the performance of supply chain entities, including coffee producers, processors, and in the case of smallholder networks, producer support organizations (PSOs), against the C.A.F.E. Practices Generic and Smallholder Scorecards. Organizational capacity and the capacity of relevant personnel is determined on an ongoing basis through participation in trainings, office audits, report reviews and field audits of the work of verifiers and inspectors. These activities are described in the “C.A.F.E. Practices Auditing and Training Manual”.

Qualified

Verifiers and their inspectors should possess technical expertise, work experience, and an educational background that reflect their ability to conduct rigorous assessment and reporting in accordance with the procedures laid out in the Verifier and Inspector Operations Manual. Verifiers need to have a university level education or five years of relevant professional experience. Qualifications and credentials alone, however, do not determine whether a verifier or inspector is qualified for C.A.F.E. Practices verification work. SCS will judge the merits of verifiers and their inspectors based on frequent review of their work and their ability to offer their clients satisfactory verification services.

2.0 Overview of C.A.F.E. Practices

C.A.F.E. Practices is a green coffee-sourcing program developed by Starbucks in collaboration with SCS, a third-party evaluation, certification and auditing firm, and Conservation International (CI), an international environmental non-governmental organization. C.A.F.E. Practices seeks to ensure that Starbucks sources sustainably grown and processed coffee by evaluating the economic, social, and environmental aspects of coffee production against a defined set of criteria, as detailed in the “C.A.F.E. Practices Generic and Smallholder Scorecards”.

Select producers, processors and suppliers, who together represent Starbucks’ coffee supply chain, are evaluated against the criteria contained in the “C.A.F.E. Practices Generic Scorecard” and “C.A.F.E. Practices Smallholder Scorecard” by third-party verification entities referred to as verification organizations. Within verification organizations, ‘verifiers’ are those personnel responsible for ensuring the quality of C.A.F.E. Practices reports submitted in the Verifier Reporting System (VRS) and serve as the main point of contact for all communications from Starbucks and SCS. ‘Inspectors’ are qualified persons working with verification organizations who are responsible for carrying out field verifications and completing reports in the VRS. The different roles assigned to both verifiers and inspectors provide a quality control mechanism necessary to ensure accurate and rigorous reporting in the C.A.F.E. Practices program.

There are four primary areas of focus in C.A.F.E. Practices: product quality, economic accountability, social responsibility, and environmental leadership. The C.A.F.E. Practices Generic and Smallholder Scorecards evaluate social responsibility, environmental leadership, and economic accountability, while product quality and economic viability are prerequisites for participation in the program and determined by Starbucks prior to any and all verification activities. The C.A.F.E. Practices Generic Scorecard contains four subject areas, including 26 criteria groups, made up of 178 indicators used to evaluate status in the program. The Smallholder Scorecard contains five subject areas (with the addition of a subject area for producer support organizations), including 29 criteria groups made up of 123 indicators.

3.0 Organization Approval Procedure

The application process for becoming an approved verification organization consists of: (i) initial contact to SCS to confirm demand for verifier activities in a given region; (ii) submitting all required application materials; (iii) undergoing thorough review by SCS, and, (iv) completing all required C.A.F.E. Practices trainings. Organizations which are successful in completing the application process are granted provisional approval in the program, with eligibility for full approval status once competence has been demonstrated. Approval in the program does not guarantee that a verification organization will be selected for work on C.A.F.E. Practices verification projects.

3.1. Application Process

The first step of the application process is for a verification organization to contact SCS. After being contacted, SCS will confirm the need for verification services capacity in the region. If a need exists, SCS will send confirmation to the organization. Once confirmation is received, a verification organization can submit a formal application.

Third-party organizations seeking to become approved to conduct Starbucks C.A.F.E. Practices verifications must apply to SCS by submitting a Verification Organization Application Form (Appendix 1) electronically to cafepactices@scsglobalservices.com.

Upon receipt of a completed application, SCS will conduct an initial assessment of the applicant's capability to conduct verification work. The initial application review process entails:

- a desk audit of the application materials to ensure accuracy and truthfulness of submitted information;
- telephone interviews to assess professional capabilities and discuss credentials; and,
- successful participation of prospective personnel responsible for carrying out C.A.F.E. Practices verification activities in an SCS approved C.A.F.E. Practices verifier and inspector training session.

3.2. Provisional Approval

Should the application review and initial training prove satisfactory, the verification organization will be granted provisional approval status, allowing them to conduct verifications of up to three C.A.F.E. Practices applicant suppliers until an initial office and field audit can be conducted by SCS. Provisional approval lasts 12 months or for three contracted verification projects, whichever comes first, but can be extended for an additional six months at the discretion of SCS if the verifier has yet to secure a client.

To achieve fully approved status, provisionally approved verification organizations must undergo an SCS shadow audit on one of their first three supply chain verifications and an SCS office audit within one year of gaining provisional approval in the program.

Provisional approval for verification organizations and subsequent full approval extends only to the country for which the verification organization has applied. Should the verification organization have multinational operations (i.e., regional or national offices) that they would like to have considered as independent verification organizations, an application needs to be submitted for each regional or national office operating in a specific region or country (Africa, Latin America, and Asia Pacific). Any provisionally or fully approved verification organization wishing to conduct work in countries other than those for which they have been approved must petition SCS for an extension of areas of work to include the additional countries or regions. Requests to add countries or regions will be reviewed on a case by case basis by SCS, taking into account the capacity of the organization to effectively manage the work and the anticipated need for additional verification services in the country or region requested. Approval status and/or capacity to do work in one or more countries do not guarantee approval to conduct verifications in any additional countries.

3.3. Full Approval

Provisionally approved verifiers are expected to undergo an initial audit from SCS within their first three C.A.F.E. Practices verification contracts, unless otherwise specified by SCS. The SCS initial audit includes:

- an onsite audit of the verifier's business office or base of operations;
- a shadow audit (observation) of verification visits at the supplier, processor and producer levels; and,
- a subsequent assessment and evaluation of the verifier reports submitted in the VRS from the shadow audit.

Verification organizations who remain in good standing during the provisional approval period, successfully undergo the initial audits, and resolve any Non Conformities (NCs) from such audits in the time allotted to do so, will be granted status as a fully approved verification organizations by SCS. This status allows verification organizations to conduct verifications of C.A.F.E. Practices applicants at will, in the regions and countries in which they are approved for work.

3.4. Maintenance of Approval Status

Each fully approved verification organization must undergo an annual field audit conducted by SCS to ensure that verifiers and their inspectors are performing their work in accordance with the procedures outlined in the Verifier Operations Manual. To maintain fully approved status, verification organizations must resolve all Non Conformities (NCs) which may result from random desk and field audits of their submitted verification reports by the deadlines set by SCS.

3.5. Suspension

Approval status is always conditional on the verification organization's good standing in the program. In the event that verification organizations are approved by SCS, but fail to adhere to the protocols and procedures outlined in the C.A.F.E. Practices Verifier and Inspector Operations Manual or in the C.A.F.E. Practices Verification Organization Approval Procedure in the course of their verification duties, SCS may elect to suspend the approval status of such organizations either with or without conditions for immediate reinstatement, depending on the severity of the non-conformance(s). Furthermore, SCS may immediately suspend a verification organization from the C.A.F.E. Practices program for a variety of reasons, including, but not limited to, those listed below.

- *A demonstrated inability to resolve outstanding NCs.* SCS will issue NCs with the expectation that the verification organization in question will take appropriate measures to address these issues with their personnel or practices to avoid compromising the overall quality of their work. If no such measures are taken as a result of NCs issued, or if the measures taken are deemed inadequate and ineffectual by SCS, the verification organization may be suspended until such time that the issues are addressed.
- *Evidence of fraudulent activities.* This includes presenting false or misleading information to clients, to SCS, or to Starbucks at any point during the verification process, and/or any member of the organization accepting bribes from clients or other stakeholders or otherwise partaking in corrupt behavior.
- *A systematic lack of adherence to reporting protocols and deadlines,* as demonstrated and documented through regular monitoring by SCS.

- *Failure to communicate with clients and SCS in a timely, transparent manner.*
- *Failure to declare a demonstrated conflict of interest on the part of the organization and/or any members of the inspection team or verifier staff.*
- *Subcontracting C.A.F.E. Practices verification work to an organization or individuals not approved for work in the program.* Additionally, an organization may not subcontract individual inspectors who are not trained on C.A.F.E. Practices or who have been previously sanctioned by SCS as a result of failure to comply with program requirements.
- *Lack of maintenance of regular internal trainings and/or inability or unwillingness to attend regionally specific mandatory SCS sponsored training workshops.* Additionally, if the organization undergoes significant changes to personnel which result in a lack of experienced and/or qualified personnel capable of carrying out C.A.F.E. Practices verification activities, the approval status may be suspended at the discretion of SCS.
- *Voluntary resignation from the program.* An approved verification organization may resign at any point and for any reason. Voluntary resignation will result in an immediate suspension of approval status and does not limit an organization's ability to reapply for approval status at any point in the future. If the verification organization wishes to reapply and has outstanding NCs as a result of SCS audits conducted prior to their resignation from the program, responses to those NCs in the form of corrective action plans will need to accompany the organizations application to the program before SCS can consider moving forward with the provisional approval procedure.

Contact information for suspended verification organizations will be immediately removed from the list of C.A.F.E. Practices approved verifiers. Except in cases of voluntary resignation as referenced above, the eligibility of any verification organizations whose approval status has been suspended to reapply to the program will be evaluated on a case by case basis. In some cases, reinstatement in the program may be conditional on fulfilling outstanding obligations, while in others, suspended organizations may be required to reapply and undergo the entire application and approval process again. Thus, maintaining fully approved status in the program is an ongoing process, one that is dependent on verification organizations fulfilling all requirements expected of them per the C.A.F.E. Practices Verifier and Inspector Operations Manual.

3.6. List of C.A.F.E. Practices Approved Verifiers

The list of current provisionally and fully approved verifiers is posted at <http://www.scsglobalservices.com/cafe-practices>. The list includes contact information and geographic regions of operation for each approved verification organization. This information allows participating coffee suppliers to contact approved verification organizations as the need arises. SCS will update the list of approved verification organizations annually or as needed based on contact information supplied by verification organizations to SCS.

3.7. Cost

There is no application fee to become an approved verification organization. However, verification organizations are responsible for paying all expenses associated with their participation in initial and ongoing SCS trainings, including, but not limited to, transportation, hotels, and food. In the case of a remote trainings conducted by way of internet and teleconference, participants are responsible for any long distance telephone charges.

Costs associated with the professional fees and expenses of SCS auditors incurred through SCS's initial and annual audits of all verification organizations will be paid by Starbucks.

4.0 Secure Handling of Documents and Disclosure of Information

All C.A.F.E. Practices applicant verification organizations must completely and truthfully disclose all pertinent information to the application process and as requested by SCS. Information submitted in each verification organization's application will be checked by SCS for accuracy and consistency. Any program applicant or provisionally or fully approved organization found to be in violation of truthful disclosure or altering documents in an unethical way will be denied approval in the program or subject to immediate suspension of approval status.

All verification organizations which are provisionally or fully approved for work in the program are expected to maintain digital and/or hard copies of documents related to their work for C.A.F.E. Practices in a safe and secure place to protect the confidentiality of the clients. Verifiers should also provide all relevant personnel with digital and/or hard copies of the most current version of the following program documents: Verifier and Inspector Operations Manual, Generic Evaluation Guidelines, and Generic and Smallholder Scorecards, along with sufficient copies of entity-specific field notes to complete verifications. In addition, all personnel records, training materials, and contact information should be updated on a recurring basis by the verification organization.

4.1. Truthful Disclosure

The application process requires that the applicant verification organizations provide full disclosure of the applicant's credentials and competency to carry out independent verification of entities (including producers, processors and producer support organizations) participating in C.A.F.E. Practices. The applicant verification organization must fully and accurately describe its:

- legal and financial structure;
- organizational structure and the technical qualifications of its key employees and contractors;
- prior experience in conducting audits within the coffee sector or other third-party auditing experience;
- potential conflicts of interest that would call into question the ability to operate as an independent verification entity;
- internal review and training procedures;
- Anti-Bribery / Anti-Corruption policy; and,
- dispute resolution policy.

Truthful disclosure will be monitored on an on-going basis through office and field audits.

4.2. Document Control

Verification organizations seeking approval status in the C.A.F.E. Practices program must demonstrate the implementation and maintenance of a document control procedure within the organization. The purpose of this procedure is to ensure that pertinent, up-to-date versions of all relevant documents are available in appropriate shared locations.

Document control procedures will be assessed at the time of initial application and reassessed annually through office audits of all organizations actively contracting work in the C.A.F.E. Practices program.

4.3. Record Keeping

Verifiers must maintain up-to-date records of all personnel records and of all records pertaining to verification work conducted, including field notes, client report approval forms, and client contracts for a minimum of three years. SCS reserves the right to review this documentation during annual office audits and at any other point deemed necessary. Verifiers should maintain updated, secure files of all of the following C.A.F.E. Practices documents:

- personnel records (for all verifiers, formally contracted and sub-contracted inspectors), including confidentiality agreements, Curriculum Vitas (CVs), qualifications, C.A.F.E. Practices training, conflict of interest declarations;
- contracts with C.A.F.E. Practices clients;
- field notes from verifications;
- records of internal reviews, disputes, and appeals, Verifier Operations Manual and Verification Organization Approval Procedures; and,
- official C.A.F.E. Practices Evaluation Guidelines, Scorecards, field notes, and all supporting program documents.

5.0 Qualification Requirements for Verifiers and Inspectors

SCS has identified four main overlapping qualifications essential for all verification organizations to possess. These include organizational capacity, internal review and training capabilities, as well as a clearly established dispute resolution process. Explanation of each of these qualifications is required in the Verification Organization Application Form.

5.1. Organizational Capacity

All new verification organizations applying for approval status must demonstrate sufficient organizational capacity to successfully fulfill all program requirements. Individuals or sole proprietors who are not working in partnership with a legally established organization are not eligible for approval status in the C.A.F.E. Practices program after 2008.

As part of the verification organization application process for new organizations, verifiers are required to describe the organizational structure as relevant to C.A.F.E. Practices activities, e.g., head office, responsible party for quality control, number of participating satellite offices, employees, and subcontractors. Verifiers must ensure that subcontracted inspectors adhere to the policies and procedures detailed in the C.A.F.E. Practices Verifier and Inspector Manual and in this approval procedure document.

5.2. Quality Management System

Verification organizations seeking approval in the program must demonstrate the implementation and maintenance of a Quality Management System (QMS). At a minimum, the QMS should include a designated quality manager for the office or organization, a quality manual, a document control procedure, an internal review procedure, an internal training procedure, and a record keeping procedure. The QMS will be assessed on an ongoing basis through office audits of all organizations seeking approval in the program or currently under provisional or full approval status.

5.3. Internal Review

Verification organizations are responsible for developing adequate internal controls and review procedures to ensure their verifier(s) and inspectors adhere to the verification procedures and policies detailed in the Verifier and Inspector Operations Manual. The Verifier Reporting System (VRS) allows verifiers to review reports submitted by their inspectors and request that their inspectors review their evaluations or make changes to the reports. SCS expects that all verification organizations will utilize an internal review process to ensure the quality and consistency of reports submitted to Starbucks in the VRS.

5.4. Internal Training

Each verification organization is responsible for providing sufficient training to inspectors on C.A.F.E. Practices and evidence of such training should be made available to SCS upon request. This should be done prior to the inspector(s) commencing work in the program if they have not received an SCS administered C.A.F.E. Practices training. In order to maintain adequate qualifications within the organization, SCS recommends that the organization implement an annual internal training plan, including a review of the inspector's field performance and report writing, for new and continuing inspectors.

Verifiers are also charged with ensuring that all communications issued by SCS or Starbucks are distributed appropriately to all personnel working as inspectors carrying out C.A.F.E. Practices verifications. These communications include, but are not limited to, Verifier Guidance Updates, information on interpretation of indicators, updates or changes to program documents or procedures, and deadlines for completing fieldwork and submitting reports.

5.5. Personnel Records

SCS requests that verification organizations supply an annually updated roster of all internally (directly) and externally (subcontracted) employed inspectors, accompanied by a copy of their confidentiality agreement, updated CVs, including C.A.F.E. Practices internal or SCS training they have received. Hard or digital copies of these records should be maintained by verification organizations and made available for SCS review in the course of annual office audits.

5.6. Appeals and Disputes Resolution

For the purposes of C.A.F.E. Practices, the following definitions for 'appeals' and 'disputes' will be utilized:

Appeal: A written request from a C.A.F.E. Practices producer or supplier for formal reconsideration of any evaluation made by a verification organization.

Dispute: An appeal that cannot be satisfactorily resolved by the verification organization or one that requires SCS resolution, such as in cases where interpretation of criteria is contested, where an appeal is submitted after reports are approved, or other exceptional cases.

Verification organizations must have written procedures (including identified personnel) and a designated reviewer or review committee for the resolution of complaints and appeals between C.A.F.E. Practices supplier participants/applicants and the verification organization. The verifier must make available information about the procedures for submitting complaints and appeals. In cases in which a complaint or appeal cannot be satisfactorily resolved between the verification organization and the C.A.F.E. Practices supplier participant or

applicant, the complaint or appeal is elevated to dispute status and referred to SCS for review. In the case of disputes, SCS will be the final mediating body for any outstanding discrepancies in indicator interpretation or procedural requirements.

Approved verification organizations are required to keep records of all complaints, appeals and disputes, and remedial actions relative to C.A.F.E. Practices, which will be inspected during annual office audits. For a more detailed discussion of the dispute resolution process, please refer to Section 7.0 of the Verifier and Inspector Operations Manual.

6.0 Code of Conduct

6.1. Confidentiality

SCS treats all information received from verification organizations, C.A.F.E. Practices participants, and all other parties involved in the C.A.F.E. Practices program as confidential. This protects the confidentiality of all information pertaining to verification reporting and status in the C.A.F.E. Practices program. At no time will SCS intentionally disclose information to outside parties regarding verification reports, a supplier's validity status in the program, or the performance of verification organizations in the program unless first authorized to do so by Starbucks and all other interested parties.

Verification organizations, including subcontracted inspectors, are also required to operate under strict confidentiality agreements with their clients. Contracts with clients seeking verification services must include a clause explaining the contracted verification organization's policy on confidentiality, and all personnel conducting C.A.F.E. Practices verifications must sign stand-alone confidentiality and non-disclosure agreements. Evidence of these documents will be requested during annual office audits performed by SCS.

6.2. Conflict of Interest

Any organization seeking approval in the C.A.F.E. Practices program must demonstrate that they do not have a conflict of interest with conducting work in the program. A conflict of interest may exist if the organization, individuals within the organization, or immediate family members of individuals within the organization: (i) has had any commercial interest in the supply chain(s) to be assessed, or provided any independent consulting services to the supply chain(s) or supply chain representative(s) to be assessed, within the two year period prior to the verification or re-verification project taking place; or (ii) has any commercial interest in a direct competitor of the supply chain or supply chain representative undergoing verification.

SCS will request a declaration of all conflicts of interest or potential conflicts of interest at the time of application to the C.A.F.E. Practices program. Conflict of interest declarations must be updated annually or by request from SCS at any time by all organizations either provisionally or fully approved in the program.

6.3. Corruption and Bribery

A bribe is defined as any money, favor, or gift given or promised in order to influence the judgment or conduct of a person in a position of authority. Giving or receiving bribes or kickbacks of any kind will not be tolerated. Verification organizations and their representatives may be offered gifts (i.e., bags of coffee, articles of clothing, or other products), souvenirs or meals or entertainment. It is SCS policy not to accept such offerings. It is also SCS's expectation that verification organizations and their representatives not accept these offerings. A client may pay for a meal that the organization would have billed the client for, assuming the cost is not in excess of the appropriate per diem rate. For example, the cost should not exceed the average cost in the local area. Other considerations that may need to be weighed

include cultural expectations or industry considerations. In any case, verification organizations must inform SCS on receipt of any offer extended by a client that the verification organization perceives may have had a corrupt intent.

Verification organizations must have in place appropriate Anti-Bribery and Anti-Corruption controls including:

- policy including a prohibition of the receipt of anything of value from a third-party (i.e., client or any other party contracting services from the verification organization);
- training to all inspectors and verifiers including red flags, suggestions for addressing potential bribery and reporting expectations;
- regular communications to all employees regarding bribery issues and reporting expectations;
- a reporting mechanism for incidences of bribe offers or requests; and,
- an internal procedure for investigating reports of bribe offers or requests.

Starbucks and SCS are committed to doing business with all parties in a fair and honest way, consistent with Starbucks Standards of Business Conduct and the SCS Auditor Code of Conduct. All individuals at a verification organization that perform work in the C.A.F.E. Practices program must be familiar with the verification organization's policies regarding corruption and bribery, as well as the Starbucks Standards of Business Conduct, Anti-Bribery Standard and the SCS Auditor Code of Conduct. In addition, verification organizations must comply with any and all regional and national laws and regulations related to bribery and corruption.

Any organization or individual wishing to report a suspected incident of corruption or bribery should email cafepractices@scsglobalservices.com and EthicsAndCompliance@starbucks.com. All reports will be treated with confidentiality and in accordance with whistleblower protection.