

Village Super Market, Inc. Code of Conduct

The primary purpose of this Code of Conduct (this “Code”) is to reaffirm the longstanding policy of Village Super Market, Inc. and its subsidiaries (collectively, “Village Super Market, Inc.” or the “Company”) concerning standards to be adhered to in the conduct of business.

All employees, officers, and directors of the Company will be referred to as associates, for the purpose of the Code.

Conduct which violates this Code constitutes an activity beyond the scope of an individual’s legitimate employment with or service to the Company, and such violation of this Code may lead to serious sanctions, including termination, and in some cases, civil and criminal liability.

This Code incorporates Village Super Market, Inc.’s Code of Ethics, which certifies that all associates:

1. Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
2. Provide constituents with information that is accurate, complete, objective, relevant, timely and understandable.
3. Comply with rules and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies.
4. Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing the associate’s independent judgment to be subordinated.
5. Respect the confidentiality of information acquired in the course of the associate’s work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of the associate’s work is not used for personal advantage.
6. Share knowledge and maintain skills important and relevant to associate’s constituents’ needs.
7. Proactively promote ethical behavior as a responsible partner among peers in the associate’s environment and community.
8. Achieve responsible use of and control over all assets and resources employed or entrusted to the associate.

Associates shall not accept and material gift or benefit from any business relation without the prior approval of a superior of at least the classification of store manager. A material gift in any benefit, gift, or act of hospitality with a value of \$100 or more. A business relation in a customer, supplier, labor union official, or any entity or person that may imply a conflict of interest or compromise an associate’s business judgment.

Associates shall not knowingly make any false or misleading statement with regard to any financial information including, but not limited to, information necessary for physical inventory, billing statements, and store receipts.

Any associate of Village Super Market, Inc. who knows of or suspects any behavior in violation of this Code should contact his/her immediate supervisor, district manager, or corporate official. No action whatsoever will be taken against any associate for reporting violation of the Code.

In addition, a toll free number ((866) 841-2545), and address (P.O. box #12176, Reno, NV 89510) and an e-mail address (villagehotline@gmail.com), has been established for anonymous submission directly to the Audit Committee of the Board of Directors of constructive, good faith complaints about the effectiveness of the company’s internal control structure and financial reporting.