



Anti-Bribery Policy

(June 8, 2021)

Costco Wholesale Corporation ("Costco") is firmly committed to compliance with laws, including those concerned with preventing corruption and violation of other standards of doing business. These laws include, among others, the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act. For simplicity, this document contains references to policies and procedures in force in the United States. Substantially similar policies and procedures govern Costco's foreign operations.

A. Costco Personnel


The Code of Ethics is the key document driving the conduct of Costco's business. It is embedded in the Employee Agreement, which defines the obligations of Costco's employees.

Number one in the Code is "Obey the Law," with the following admonitions:

- Do not offer, give, ask for, or receive any form of bribe or kickback to or from any person or pay to expedite government action or otherwise act in violation of the Foreign Corrupt Practices Act.
- Conduct business in and with foreign countries in a manner that is legal and proper under United States and foreign laws.
- Respect all public officials and their positions.
- Comply with all laws and other legal requirements.

The Code thus prohibits employees from giving or receiving gratuities in connection with Costco's business, whether or not legal or otherwise permissible under local law or custom. The Code applies to all directors, officers, and employees of Costco. Violation is cause for disciplinary action.

All Costco employees are expected to promptly report actual or suspected violations of the Code. Multiple reporting options are

available, ranging from the Open Door Policy, under which employees may report any work-related issue to any manager or supervisor at Costco, to the whistleblower website www.costco.ethicspoint.com  (which allows confidential and anonymous reporting by anyone, wherever located, in several languages) to contacting the General Counsel. The Costco whistleblower policy protects employees from retaliation for complaints made in good faith

In addition, Costco's travel and entertainment policies, segregation of duties policies, and charitable contribution policies, among others, are designed to ensure compliance with Costco's Code. Costco's internal and external auditors regularly monitor such policies for compliance, and employee training on the Code is required.

B. Costco Suppliers and Contractors

Anti-bribery and audit provisions are included in contracts with suppliers and contractors. Costco also expects suppliers or potential suppliers to promptly report actual or suspected violations. Costco sends out an annual reminder to suppliers of its gratuity policy. Suppliers and contractors that violate Costco's gratuity policies are subject to termination. Anti-bribery training is available to Costco's suppliers and contractors and required in some cases.

For mutual convenience, Costco asks its elevated risk third parties to register with TRACE's online third-party management system ("TPMS") (<https://tpms.traceinternational.org>) to obtain from TRACE, for a nominal fee, a TRAC registration number and provide its TRAC profile to Costco for review. In certain circumstances, Costco may ask the third party to register through TPMS for a more intensive screening, such as TRACE Certification.

Questions concerning this policy should be directed to General Counsel, Costco Wholesale Corporation, 999 Lake Drive, Issaquah, WA 98027.