Code of Ethics
At our best.

Every decision. Every day.

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To all Best Buy Stakeholders:

We've built something special at Best Buy. For more than 60 years, our shared purpose and commitment have helped create a culture centered on people, strong relationships and trust. Innovation helps us grow, but it's our company values that define who we are and guide how we do business.

One way we live those values is by following the Best Buy Code of Ethics. It explains what we expect of ourselves and how we show up for each other, our customers and the communities we serve.

The Code comes down to a few simple expectations: act with integrity, treat people with respect, speak up when something doesn't seem right, and always give your best. Those expectations apply to every one of us.

When we understand the Code and put it into practice every day, we protect the trust we've earned to allow us to continue enriching lives through technology. At our best. Every decision. Every day.

Jason Bonfig

Jason Bonfig
CEO

Defining us.
Inspiring us.

PURPOSE

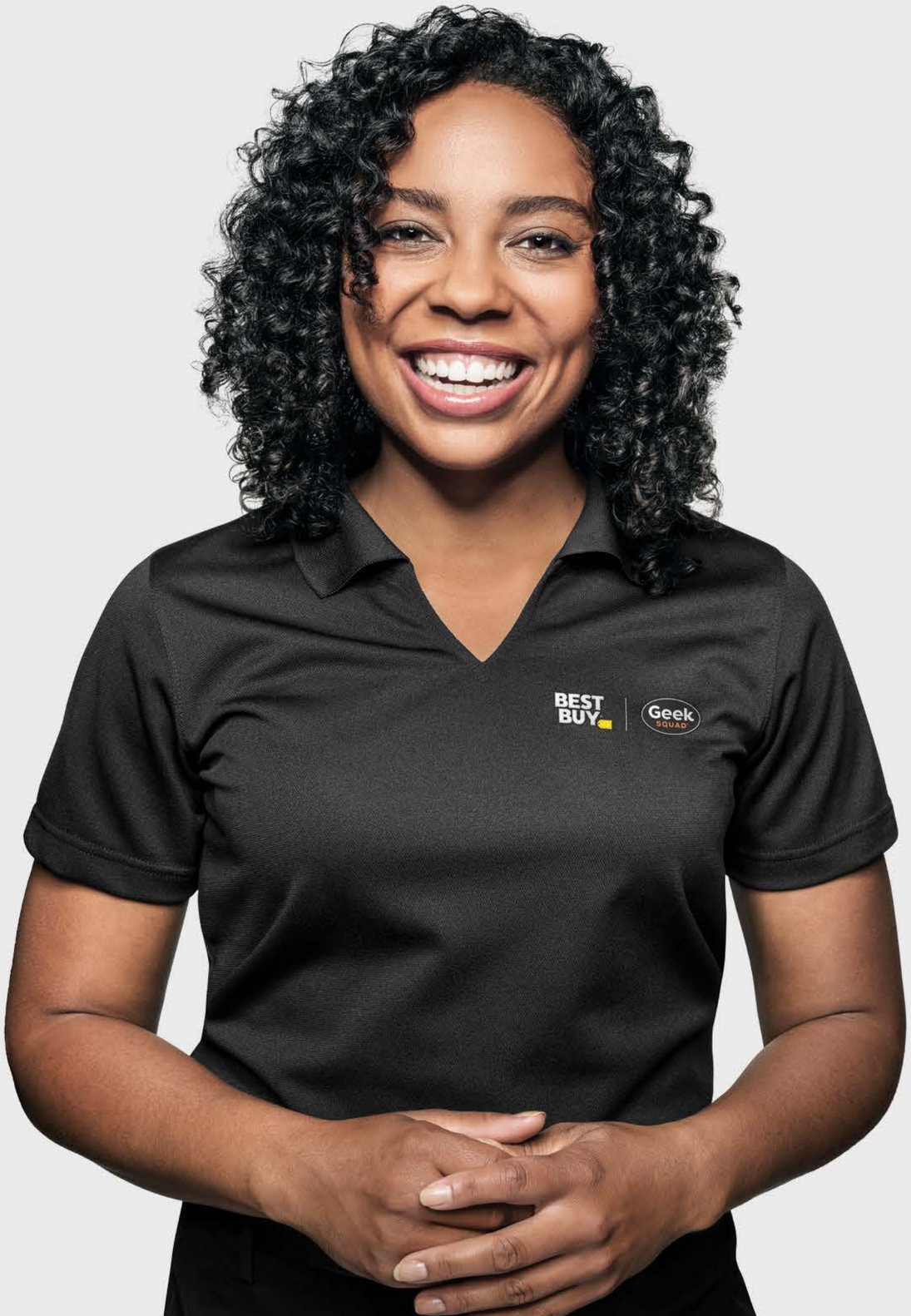
Enrich lives through technology.

VISION

We humanize and personalize technology solutions for every stage of life.

VALUES

Unleash the power of our people.
Learn from challenge and change.
Show respect, humility and integrity.
Have fun while being the best.



Introduction.

Our Code

Our responsibilities

Our leaders' responsibilities

Speak up with confidence

Our Code.

At our best. Every decision. Every day. How can you be at **your** best? Start here, with our Code. It will help you take our Purpose, Vision and Values and apply them to the everyday work you do on behalf of Best Buy. It will also help you navigate your way through (sometimes sticky) ethical dilemmas.

Will the Code provide the answer to every question you might encounter while working at Best Buy?

No document could do that. But it will give you the tools you need to make the right decision, regardless of the challenges you might face. And it will point you to resources and people who can help you when the right decision is not so clear.

Remember your moral compass when things get tough. Because ultimately, no document, including this Code, is a substitute for your good judgment.

Who has to comply with our Code? You do.

Actually, everyone at our Company does.

And when we say "Company" and "Best Buy," we mean board members, officers, employees, contingent workers and contracted workers at Best Buy and all of its subsidiaries around the world – a family of more than 85,000.

What happens when our Code is violated? Our stakeholders' trust is weakened and our brand is tarnished. That's why violations of the Code, our policies or the law can result in disciplinary action, up to and including termination of employment. Depending on how serious the incident is, there can even be civil or criminal consequences for the person involved and for Best Buy.

What about our suppliers, vendors and other third-party business partners?

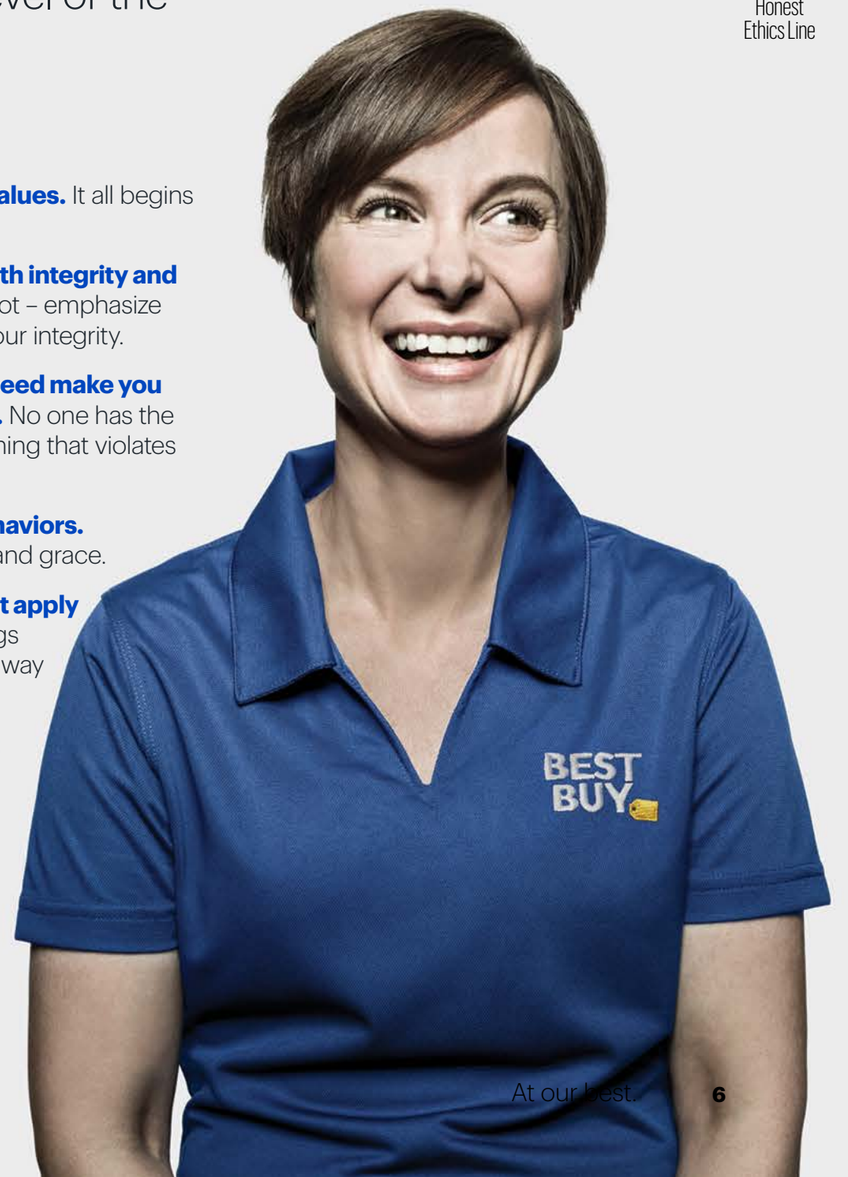
We expect them to uphold the same high standards of business conduct as we do and to follow the spirit of our Code.

The specific requirements that they must meet are outlined in our Supplier Code of Conduct, located on our **Best Buy Partner Portal**.

Our responsibilities.

On the pages that follow, you'll find details about what it means to be "At our best. Every decision. Every day." But what it comes down to is that Best Buy expects everyone, at every level of the Company to:

- **Live our Purpose, Vision and Values.** It all begins and ends with that.
- **Use good judgment and act with integrity and honesty.** We cannot – and will not – emphasize performance at the expense of our integrity.
- **Do not let the pressure to succeed make you do things you know are wrong.** No one has the authority to make you do something that violates our Code.
- **Demonstrate our inclusive behaviors.** Vulnerability, empathy, courage and grace.
- **Follow all policies and laws that apply to your job.** Complete all trainings assigned to you – that's the best way to learn.
- **Speak up if you see or suspect misconduct or unethical behavior.** It's always the right thing to do.



Our leaders' responsibilities.

Leadership is about purposeful and authentic service. It's our leaders' responsibility to create an experience among their teams that leads to a lasting emotional connection to Best Buy and a dedication to serving our customers. Leaders accomplish this by practicing our Values and these Inclusive Behaviors.

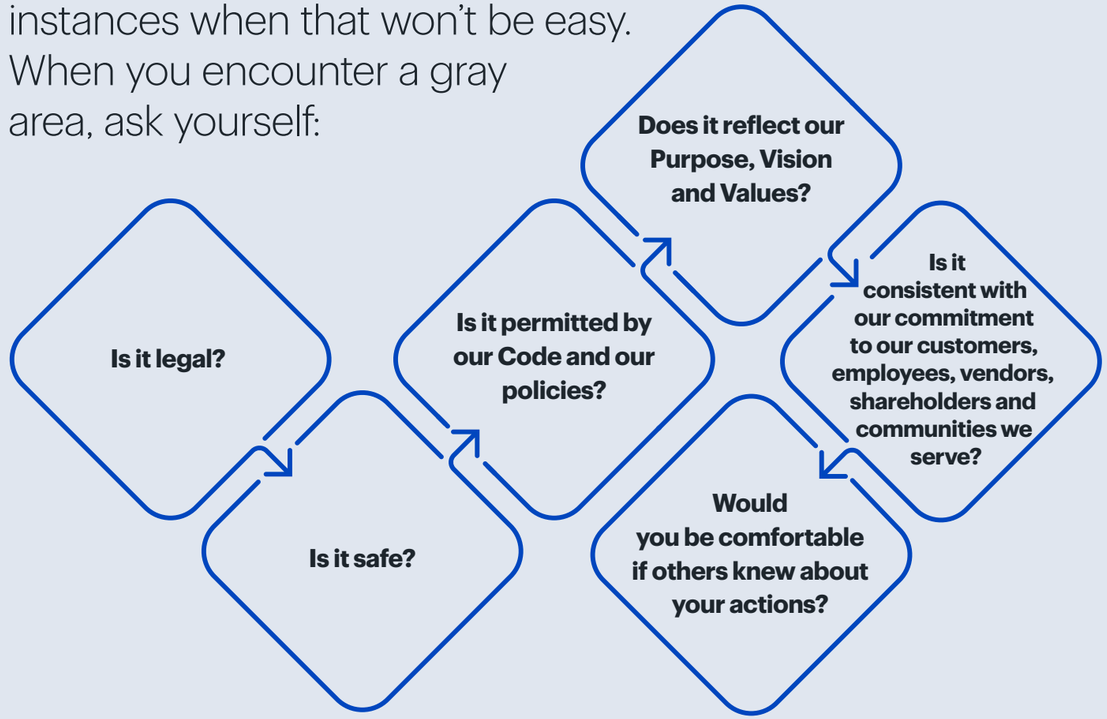
- **Vulnerability:** willingness to show weakness today to be stronger tomorrow.
- **Empathy:** being purposeful about understanding the unique experience of everyone around you.
- **Courage:** empowering everyone to speak up and take action for what is right.
- **Grace:** creating an environment to take calculated risks and learn from mistakes.

When leaders demonstrate Inclusive Behaviors, employees feel like they truly belong, allowing them to invest in Best Buy's purpose and bring their best, most authentic selves forward in service of our customers.

What is expected from our leaders?

- Talk with your team frequently about the importance of doing business with integrity, then model behaviors that bring integrity to life.
- Foster an environment in which employees feel comfortable coming to you with questions and concerns.
- Document and escalate concerns raised to you through the correct channels. Don't put the burden back on the employee to solve the issue.
- Don't retaliate against employees who raise a concern in good faith.

When the answer is not clear... In every decision you make, we count on you to use good judgment. But there will be instances when that won't be easy. When you encounter a gray area, ask yourself:



If you answer "yes" to all of these questions, it's probably OK to proceed. But if you answer "no" or "I'm not sure" at any point, stop and reconsider. Keep in mind, it's always appropriate (and smart!) to ask for help if you are not certain.

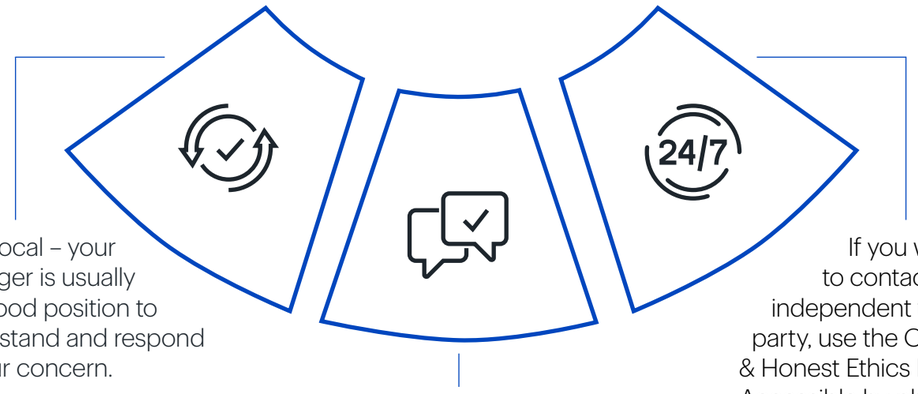
What if?

There's a conflict between the Code and the way we do something in my department.

Generally, if a local business practice conflicts with our Code, follow the Code. If a local law conflicts with our Code, follow the law. Still not sure? Either follow the stricter standard or seek guidance from your manager or the Ethics Office.

Speak up with confidence.

Concerned? Speak up. If you see or experience conduct that is inconsistent with our high standards, have the courage to speak up. Best Buy takes all reported concerns seriously. And there are many ways to share your concerns.



Start local – your manager is usually in a good position to understand and respond to your concern.

If you're not comfortable doing that, reach out to Human Resources (HR), Employee Relations or the Ethics Office.

If you want to contact an independent third party, use the Open & Honest Ethics Line. Accessible by phone or web (BestBuyEthics.com), the Ethics Line allows you (anonymously, if you wish) to ask questions or share your concerns 24 hours a day, 7 days a week. Information you provide through the Ethics Line is documented in detail and forwarded to the Ethics Office.

See this icon on the right side of the screen?

If you are aware of misconduct or unethical behavior, click on the icon to go directly to the Open & Honest Ethics Line reporting page.

Show respect, humility and integrity.

What happens next? No matter who you contact or which resource you choose, your concern will be promptly reviewed and, if necessary, investigated by the team with the appropriate subject matter expertise. Information you provide will be shared only with people who need to know in order to resolve the issue.

If the concern is substantiated, Employee Relations will make a recommendation to the individual's manager regarding what, if any, disciplinary action is needed using the Corrective Action Guidelines. The reporter will be notified when the matter is resolved and whether the claim was substantiated or not. Additional details of the outcome will likely not be shared in order to protect the confidentiality of the investigation.

Retaliation? Not here. Best Buy does not allow any form of retaliation against anyone for reporting a concern in good faith or cooperating in an investigation. If you believe you have been retaliated against, reach out to Employee Relations, the Ethics Office or the Open & Honest Ethics Line. Retaliation is not something you tolerate. It's something you report.

What does "good faith" mean?

Sharing a concern in good faith means that you honestly believe that there may be a violation of our Code, our policies or the law.

Find out more.

- Investigation Resource for Reporters
- Investigation Resource for Subjects
- Investigation Resource for Witnesses
- Investigation Resource for Leaders



01 Our customers.

Advertise and sell responsibly

Promote customer safety
and product quality

Keep private information private

Our customers:

Customers are at the heart of all we do. Our purpose is to enrich their lives through technology, and we do that by providing amazing customer experiences across all our channels. Whether on our app, online or in-store, we help customers discover how technology can elevate their lives and do more of what they love.

Advertise and sell responsibly.

Our customers are the reason we are here, so we treat them with respect, honesty and fairness.

The success of our business depends on putting people before all else, and providing them an unparalleled level of service before, during and after the sale of our products and services or within any in-person or digital experience. We have standard operating procedures (SOPs) in place to ensure that we meet (or exceed!) customer expectations and provide a meaningful, consistent experience, no matter which employee they meet. It is the right thing to do and it aligns with our shared Values.

Every decision. Every day.

- **Treat our customers equitably.** Provide excellent customer experiences to all, regardless of individual differences.
- **Preserve trust.** Honesty really is the best policy, and clear, accurate information helps our customers make informed buying decisions.
- **Comply with applicable laws and know our SOPs.** In our advertising, sales and promotional materials, be fair, truthful and transparent. Make sure that descriptions and information you provide accurately represent the quality, features, availability and price of our products and services. In addition, any claims you make about our products and services need to be adequately substantiated.
- **Watch out!** Be alert for fraudulent and suspicious transactions. And follow policies and trainings designed to prevent our products and services from being used to facilitate illicit activity.

If we're not credible, customers won't buy what we sell. But worse than that, customers won't trust us. That's why we're determined to always advertise, market and sell responsibly.

- **Follow our Price Match Guarantee.** We want our customers to have a consistent experience with our products and pricing. Honor Best Buy system-verified competitor prices via price match **when requested** by our customers.
- **Honor our return and exchange policies.** Be transparent about what our membership plans, our policies and our manufacturer warranties cover and exclude. If a product or service doesn't live up to a customer's expectation and it meets our return or exchange guidelines, respect their request. Customers who feel good about our processes will be more inclined to come back.

What if?

Sometimes I encourage customers to buy service plans, accessories or services. I want our territory to come out on top in terms of sales. Is that OK?

Selling additional products and services is important, but our customers should never feel pressured to purchase something they don't want or need. Make sure your efforts are focused on informing and empowering our customers, not intimidating them.

Find out more.

- Policy for Equal Treatment of Customers
- GSP Fulfillment SOP
- Erosion SOP
- My Best Buy Memberships SOP
- No-Receipt Returns SOP
- Pay by Link SOP
- Price Match Guarantee SOP
- Processing AppleCare Plans SOP
- Processing GSP Plans SOP
- Responding to Customer Concerns SOP
- Return and Exchange Policies SOP
- Tender Acceptance (POS) SOP
- Tender Acceptance (Tyler) SOP

Promote customer safety and product quality.

We set high standards for ourselves and our vendors.

We expect the products we sell to work the way they're supposed to and to be safe for our customers to use. We take pride in our Company and the products we offer, and we take action on any potential safety hazards or quality concerns not just to ensure compliance, but also because it's the right thing to do.

Every decision. Every day.

- **Listen.** Everyone has a role in ensuring safer products. If you are working in the stores, you may hear from customers about experiences with products that may be a potential safety issue. If you have contact with physicians and hospitals about our connected health devices, you may learn more about what's working well and what isn't. If you're on our Geek Squad or in a Care Center, you're getting real-time feedback about the products and services we sell. Stay aware and report anything of concern.
- **Focus on quality.** Maintain our customers' trust in our products and services by striving for continuous improvement and never compromising on quality.
- **Set expectations.** If you are selecting our product assortment, you are in a position to inform third parties and vendors of our product safety requirements.
- **Complete the training.** If applicable to you, complete your product safety learning in a timely fashion.
- **Raise your hand.** Contact your manager and make a report using the Product Safety Incident Report Form if you see or suspect that a product we sell:
  - Is creating a potential risk of injury or illness to customers
  - May be hazardous or dangerous for customers
  - May have caused a potential safety incident
  - Doesn't comply with rules, regulations, standards or bans enforced by any governmental agency



When in doubt, report. If you are not sure that an incident rises to the level of a product safety concern, report it.

What if?

A customer returned a computer with obvious damage from melting because it overheated. Is there anything more I need to do other than process the return?

Yes. Resolve the issue with the customer but remember, potential product safety issues like this, including those affecting our Best Buy Health products, need to be reported through the Product Safety Incident Reporting Portal. The Product Safety team will review the details of the report and determine if further action is needed.

Find out more.

- Best Buy Health Quality Policy
- Product Safety Incident Reporting SOP
- Product Safety Incident Report Form

Keep private information private.

We respect and protect personal information.

Customers, vendors and co-workers who provide us with their personal information trust that we will handle it with care and use it appropriately in accordance with the law and our stated privacy notices and policies.

Every decision. Every day.

- **Recognize "personal information."** Personal information is **any** information that can reasonably be linked to a person. In the Best Buy environment, we often link information to individuals by using member numbers, Party IDs, tokens or other "unique identifiers."
- **Honor our privacy promises.** Our collection, use and sharing of personal information must be consistent with our privacy policy on BestBuy.com unless another policy applies (e.g. Lively.com, Yardbird.com). We say what we do and do what we say.
- **Know when it's OK to share.** Dozens of state laws have expanded restrictions on sharing personal information and provide consumers the ability to opt out of certain sharing – especially when it comes to advertising. It's more important than ever to have the appropriate contract in place before sharing personal information outside Best Buy and have processes in place to honor applicable opt outs. And because personal information is confidential information, we don't share it with anyone who doesn't have a business need to know it.
- **Get clearance!** Applicable law contains some serious privacy restrictions, security requirements and (gulp) individual criminal penalties when it comes to processing personal health information. International data transfers present additional complications and legal exposure. Work with Enterprise Privacy to clear any transfer of personal information from Best Buy Health to another area of the Company.
- **Don't forget customer devices.** Our policies apply not only to information stored on Company systems and records, but also to information stored on customer devices we handle when providing services.

Suspect that personal information has been compromised or used in a way that violates our policies? Report it immediately to the Emergency Hotline. It's what you would want someone to do if it was your information.

We've extended our personal information options across the United States

Several states have passed laws giving consumers additional privacy rights. Best Buy provides these personal information options across the United States:

- **Access:** Consumers may receive copies of all personal information about them we have on file.
- **Delete:** Upon request, Best Buy will delete the personal information we have about a consumer. There are exceptions to this requirement, but we still must follow our records management policies and delete data on a timely basis.
- **Do Not Sell:** Under these new laws, the definition of "sell" is broader than what you might think. Best Buy has given visitors to our digital properties opt-out options concerning data collected by our website and consumer app that's shared with our advertising partners.
- **Data Use:** Consumers have a right to know how we will use their personal information when they give it to us. Make sure any uses are consistent with our privacy notice.

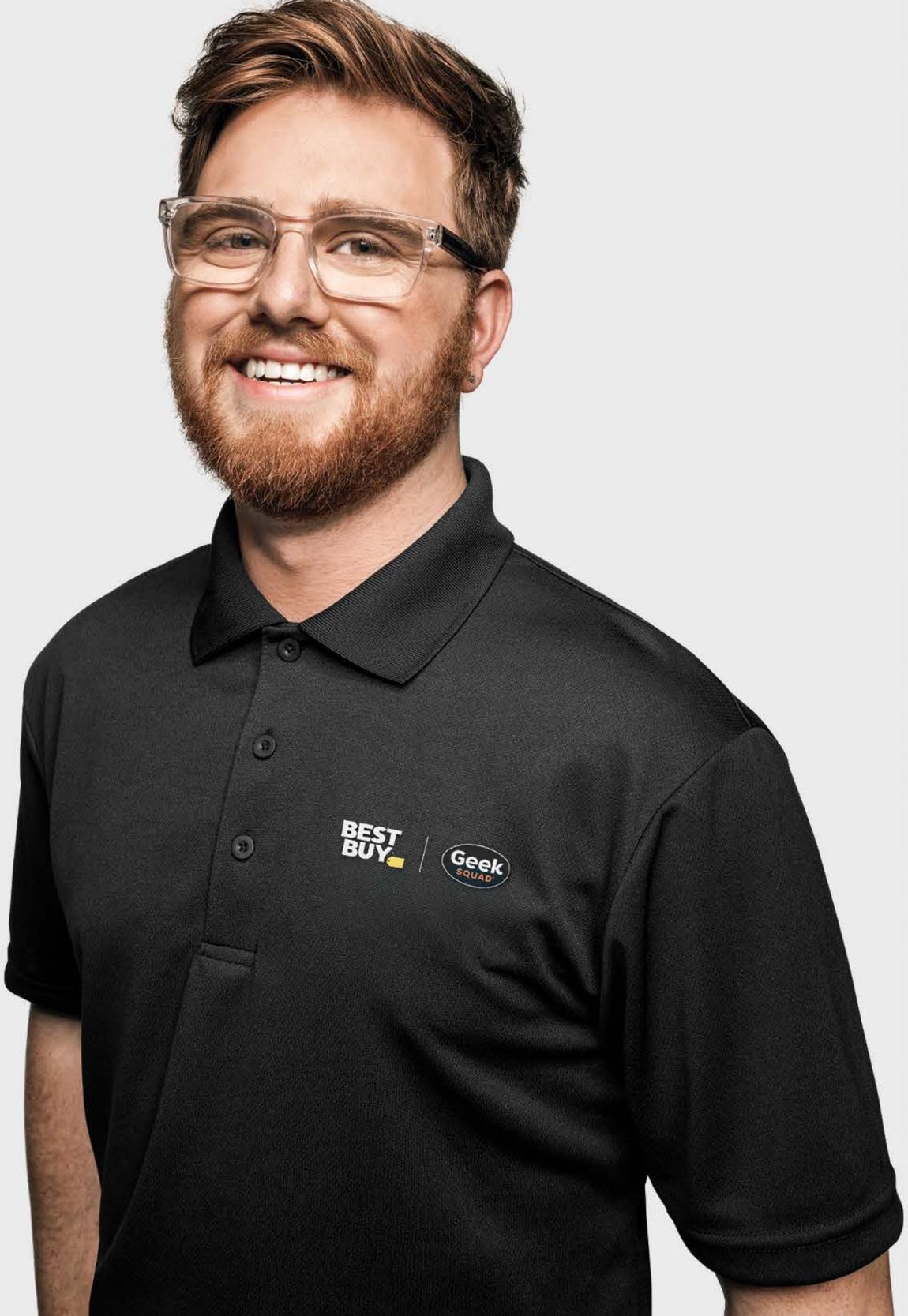
What if?

I've heard great things about an online analytics tool. Even better, it's FREE! There aren't any customer names in the file I'd upload so there aren't any privacy issues here, right?

Any time you're getting something for free online, chances are you're not the customer, you're the product. Companies provide these free tools so they can make money using or selling the data collected. Even if you remove names there are still privacy risks. So get the pros in Procurement+ to help you navigate any sharing of data with third parties, even if it's on a trial basis. And remember, "personal information" is **any** information linkable to a person, no matter how many links in the chain are required.

Find out more.

- Confidentiality Policy
- Customer Information Policy
- Information and Records Management Policy
- Cybersecurity Policy
- Privacy Policy



02 Our employees.

Drive inclusion and belonging

Respect each other

Honor human rights

Maintain a safe and healthy workplace

Our employees:

Our greatest asset is our employees. It's essential that all employees are empowered to develop in an inclusive environment where they feel like they belong and are free to bring their full selves to work.

Drive inclusion and belonging.



We believe our people are our greatest asset.

We foster an inclusive work environment with a culture of belonging where everyone feels valued and has the opportunity to thrive. You can be yourself here. In fact, we all bring a unique set of backgrounds, experiences and skills to our work at Best Buy, and that's a beautiful thing. We know that creating this environment is not only the right thing to do at Best Buy and within our communities but is also directly tied to driving the long-term success of our business. Company-wide, we make a commitment to promote inclusion and equal employment opportunity, observe fair employment practices and not tolerate discrimination.

Every decision. Every day.

- **Be at your best.** Be fair, honest and constructive, but also be kind. Build trust and collaboration.
- **Bring out the best in others.** Be conscious of your assumptions. And be open to – and respectful of – viewpoints and perspectives that differ from yours, because our differences shouldn't divide us. They make us better.
- **Foster an inclusive environment.** Our inclusive behaviors empower our employees to bring their best selves forward in service of our customers. Practice vulnerability, empathy, courage and grace in your everyday actions and create a welcoming place for all.
- **Know what Best Buy expects.** We make hiring, promotion, training, compensation and other employment-related decisions based on job requirements and an individual's qualifications without regard to any characteristics protected by law. In addition, we provide reasonable accommodations for employees and applicants (and for customers, too, when necessary), including accommodations related to their religious beliefs and practices; disabilities; and pregnancy, childbirth and related medical conditions.

"Characteristics protected by law" include:

- Age
- Ancestry
- Alienage or citizenship
- Color
- Religion (including religious dress and grooming practices)
- Ethnicity
- Disability (mental and physical)
- Marital or family status
- Medical condition
- Genetic information (including testing and characteristics)
- Military and veteran status
- Political affiliation
- National origin (including language use)
- Race
- Sex (including pregnancy, childbirth, breastfeeding and related conditions)
- Gender identity and gender expression
- Sexual orientation

Help maintain a workplace where everyone feels valued and encouraged to contribute – an environment where all of us have an equal opportunity to succeed.

What if?

I suspect discrimination. I applied for a job that requires a lot of travel, and I think a less-qualified co-worker got the job because he is single. What should I do?

Raise your concern. Employment decisions should be based on job-related criteria, without regard to whether you're married or single. If you're not comfortable talking directly with the decision-maker, reach out to someone in HR or Employee Relations or use the Open & Honest Ethics Line.

Find out more.

- Anti-Harassment and Non-Discrimination Policy
- Policy for Equal Treatment of Customers
- UN LGBTI Standards of Conduct for Business

Respect each other.

We promote a work environment that's free of harassment, bullying, and abusive conduct.

To be at your best, you must first feel safe – both physically and psychologically. A positive, respectful workplace gives everyone the opportunity to do their best work, without fear or intimidation. That's why each of us, at every level of our Company and every location where we operate, has an obligation to put a stop to harassment.

Every decision. Every day.

- **Check your own behavior.** Treat everyone with dignity and respect. Everyone.
- **Recognize harassment when you see it.** Harassment is intimidating, hostile or offensive conduct or communication that interferes with someone's ability to work or creates a hostile work environment.
- **Get involved.** If you see or experience disrespectful or inappropriate behavior of any kind at Best Buy, don't ignore it. If it feels safe to do so, tell the person to stop. If you're uncomfortable approaching the person directly, talk to your manager, HR or Employee Relations or use the Open & Honest Ethics Line. Leaders who have received a report of or become aware of harassment must report it.
- **Don't be afraid to do the right thing.** Remember, Best Buy prohibits retaliation against anyone who comes forward with a good-faith concern.

Unleash the power of our people.

What if?

At team meetings, our manager often makes jokes or comments about certain co-workers' nationality and then says, "just kidding." Even though the comments aren't directed at me, they clearly make others uncomfortable. But no one says anything. I don't want to do something that will affect my job or put me on my manager's bad side. Should I just stay out of it?

We have a responsibility to promote a respectful workplace for all, and derogatory comments about someone's nationality don't align with our Values and inclusive behaviors. If you don't feel comfortable having a one-on-one with your manager, contact HR or Employee Relations or use the Open & Honest Ethics Line to share your concerns. Best Buy does not tolerate retaliation against anyone who reports a concern in good faith.

It's still harassment whether...

- It happens on or off the clock
- It involves members of the same or opposite sex
- It happens on or off of Best Buy property
- It is committed by a vendor or customer
- It takes place via email or text or on social media
- It is physical, verbal, nonverbal, visual or sexual in nature

Find out more.

- Anti-Harassment and Non-Discrimination Policy

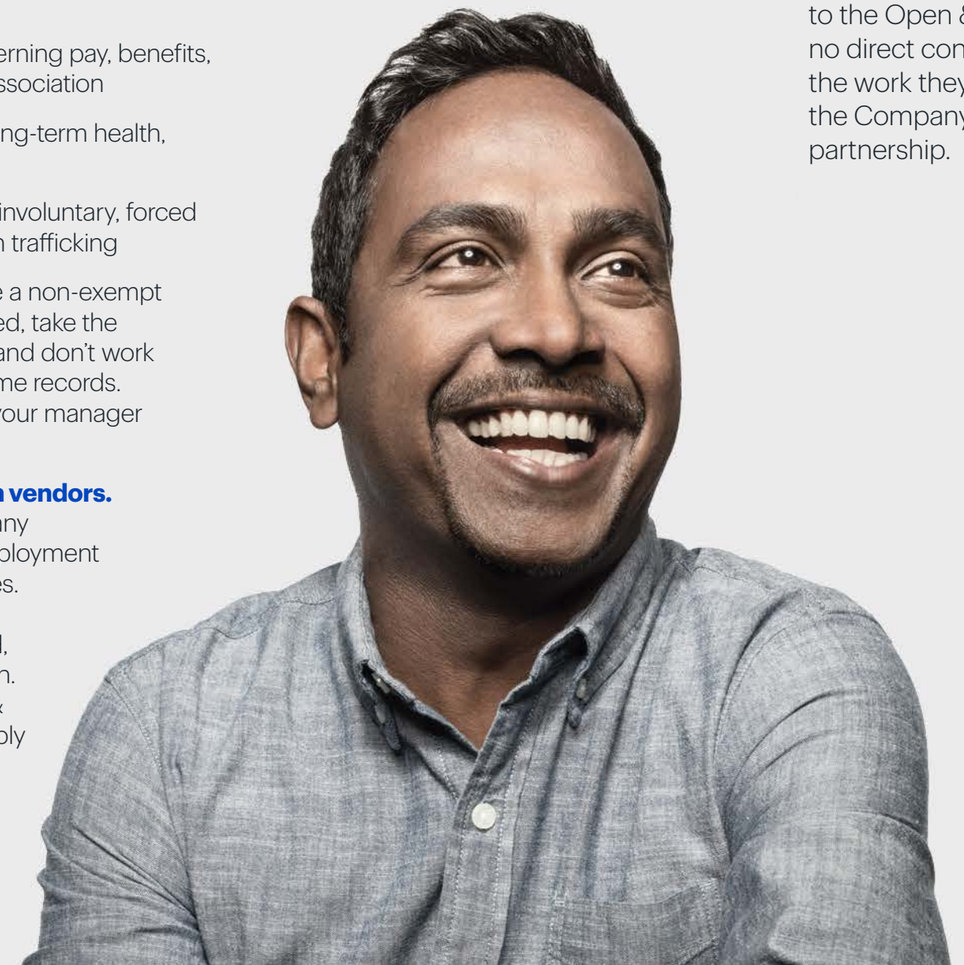
Honor human rights.

We are committed to human dignity and fair employment practices.

From a Blue Shirt serving customers in a store to a worker at a vendor's facility overseas, we seek to support, respect and advance the human rights of all people everywhere. We are committed to putting people first, conducting business in an ethical and responsible way and partnering with third parties who aspire to the same high standards that we do.

Every decision. Every day.

- **Understand our commitment.** As an employee, you devote your time, talents and energy to fulfilling our mission. And, as a company, Best Buy understands its responsibility to compensate you fairly, abiding by the employment laws in the markets where we operate. We:
  - Comply with all applicable laws concerning pay, benefits, working conditions and freedom of association
  - Comply with laws that promote the long-term health, safety and wellness of all employees
  - Prohibit all forms of slavery, including involuntary, forced or prison labor, child labor and human trafficking
- **Record your time accurately.** If you're a non-exempt (hourly) employee, report all time worked, take the meal and rest breaks you're entitled to and don't work "off the clock" or falsify anyone else's time records. Raise any timekeeping questions with your manager or Employee Relations.
- **Expect no less from our supply chain vendors.** We never knowingly do business with any individual or company that violates employment laws or engages in human rights abuses. We also expect our suppliers to source responsibly, monitor their suppliers and, where needed, require corrective action. In support of this, we make our Open & Honest Ethics Line available to our supply chain vendors.



What if?

I saw a story posted on social media about one of our vendors. It suggested that they may have been involved in an incident related to unfair labor practices. Since it hasn't been proven and it doesn't involve Best Buy, do I need to take any action?

Yes. We hold our vendors accountable to our high standards, and if there is even a hint of improper or illegal behavior, you should report your concern to the Open & Honest Ethics Line. Even if there is no direct connection between the allegations and the work they do with us, speaking up will help the Company evaluate how it might affect our partnership.

Did you know?

We align our operations with the United Nations Guiding Principles on Business and Human Rights.

Find out more.

- Time Records, Rest Breaks and Meal Periods Policy
- Conflict Minerals Statement
- Human Rights Statement

Maintain a safe and healthy workplace.

We don’t compromise when it comes to safety.

A culture of safety is something we’ve worked hard to build through policies and procedures, inspections and checklists, safety committees and safety training. But the biggest influence on workplace safety? Hardworking employees like you, who are alert and aware, model safe work practices and look out for customers and co-workers every day.

Every decision. Every day.

- **Protect yourself and others.** Comply with all health and safety regulations, policies and procedures that apply to your job and work location and familiarize yourself with any hazards in your work area. Stay up to date on any eLearning requirements. And report any incidents, injuries, near-misses or unsafe conditions right away so we can take steps to make sure you’re OK and prevent harm to others.
- **Think safety. Every task. Every day.** When it comes to operating machinery and equipment, only take on tasks for which you have been trained or certified. For all tasks, follow posted warning signs and restrictions and, when required, wear personal protective equipment (PPE), fall protection and fall restraints.
- **Bring your best self to work.** Substance abuse can not only prevent you from doing your job safely but also jeopardize the safety of others. That’s why you are prohibited from being under the influence of alcohol or an Illegal Drug, or impaired by a Legal Drug while you’re at work or conducting Company business. There may be occasions where drinking alcoholic beverages while conducting Company business is permitted. Just make sure you follow the law and our policies and exercise both moderation and good judgment.
- **Prevent workplace violence.** We prohibit violence and threats of violence in the workplace. Practice good workplace safety and security habits, use the C.A.L.M. de-escalation technique, and watch for and report all threats or concerns of workplace violence to the Emergency Hotline.



What are some warning signs of workplace violence?

- Sudden, persistent complaints about being treated unfairly
- Poor relationships with co-workers or management
- Sudden changes in behavior, mood swings or erratic behavior
- Paranoid behavior
- Physical signs of irritation such as pacing, yelling, screaming, making verbally abusive or threatening remarks or becoming argumentative

Find out more.

- Alcohol-Free and Drug-Free Workplace Policy
- Inappropriate Conduct Policy
- Safety Policy
- Violence-Free Workplace Policy
- Workplace Violence Awareness Hub



03 Our vendors.

Maintain integrity in vendor relations

Foster mutually beneficial partnerships

Follow global trade laws

Compete fairly

Avoid conflicts of interest

Avoid bribery and corruption

Our vendors:

We partner with the world's foremost tech companies, helping commercialize their innovations and bring them to life for our customers.

Maintain integrity in vendor relations.

We protect our ability to make business decisions free of undue influence.

We rely on sound judgment and the best interests of our Company to guide us. Every decision. Every day. That's why the Company has very specific standards about what you may accept from vendors. These standards will help you make sure that anything accepted won't create a sense of obligation or suggest something improper.

Every decision. Every day.

- **Check our policy.** Before you accept a gift or an invitation from a vendor – know what's permitted and obtain all necessary approvals in advance. Our Gifts and Vendor Relations Policy covers not only gifts and entertainment, but also specifics about vendor-paid meals, travel, lodging, product samples and training. It even provides guidance on customer tips and gifts.
- **Use good judgment.** Ask yourself questions like: Will it compromise my business judgment or give the appearance of doing so? Will it create a sense of obligation? Have I obtained all the necessary approvals?
- **If you're not sure, ask.** If the right course of action is not clear after consulting the policy, seek guidance from the Ethics Office.

Did you know?

A "gift" is anything of value, including cash or gift cards.

A "vendor" includes any individual or company that does, or is actively seeking to do, business with our Company.



What if?

A vendor sent me a vendor-branded highlighter. What should I do with it?

Keep it. There are a few exceptions to the no-gift rule that are described in the policy. It is OK to accept a token promotional item of nominal value, such as a highlighter.

Find out more.

- Gifts and Vendor Relations Policy

Foster mutually beneficial partnerships.

We value our vendors, suppliers and other third parties.

We recognize that responsible, reliable business partners are key to growing our business and stoking our success, so we have a Supplier Code of Conduct that lays out the standards we have for partners who want to do business with us to ensure working conditions in supply chains are safe, and business is conducted responsibly, ethically and with respect for human rights and the environment. But we recognize that we, too, have obligations when partnering with vendors, suppliers and other third parties. And we meet them. Because relationships built on mutual trust and respect result in a win/win/win – for our customers, for our partners and for us. With the development of our Marketplace, these partners include sellers that offer goods and services directly to consumers on our website.

Every decision. Every day.

- **Choose wisely.** We want to work with partners who share our Values and who will meet our business needs. So, complete and evaluate all required vendor risk assessments. And exercise due diligence and base sourcing decisions on objective criteria such as those evaluated risks as well as quality, price, service and delivery record.
- **Act responsibly.** Do not act, or fail to act, in a way that may restrict or affect the competitive process for choosing suppliers or create undue influence in the supplier selection process. Always disclose potential conflicts of interest involving a potential supplier.
- **Monitor closely.** Once a contract is in place, make sure they're following the law and the Supplier Code of Conduct. Stay involved to make sure that our partners are honoring all their commitments... and that we're honoring ours. Be aware of our Anti-Money Laundering Policy and report any inconsistent or unusual activity to your manager, HR or Employee Relations or use the Open & Honest Ethics Line.
- **Remember that trust is a two-way street.** We expect our partners to protect our confidential information, and we have an obligation to protect theirs as well, including any personal information or intellectual property they entrust to us.

What if?

I am part of the decision-making team for a new supplier, and my brother-in-law works for one of the companies we're considering. His company has a great track record in terms of on-time delivery and the best rates by far. Is it OK for me to recommend the company since I think it will be in the best interest of Best Buy?

Yes, but you need to be transparent about your relationship. And although you may feel like you've weighed all options and can make an objective decision, it would be best for you to mitigate the conflict of interest by removing yourself from the decision-making team so as not to suggest the appearance of something unfair or improper.

Did you know?

Sometimes, we are the vendor! And when we are, our obligation to do well by doing good endures. We maintain the same commitment to ethics and integrity in serving our client organizations as we expect from our own vendors.

Find out more.

- Anti-Money Laundering Policy
- Best Buy Partner Portal
- Supplier Code of Conduct

Follow global trade laws.

We want to be able to buy and sell products across the globe.

We know that doing business internationally is a privilege – one that can be lost if we violate import, export or trade compliance laws. So, we're careful to stay on top of what's required and follow all policies, procedures and laws. We don't want one bad decision or misstep, even if it's unintentional, to affect our ability to reach customers and vendors around the world.

Every decision. Every day.

- **Check.** If you are involved in moving our products, services or technology across international borders, you need to follow the laws of the countries where you do business. Contact the Best Buy Global Trade Compliance team at the initial stage for any transaction that involves international trade, including shipments to Puerto Rico. They will evaluate the transaction to confirm it can be completed in a compliant manner. If needed, they will help you obtain any required licenses before exporting our products, and document transactions completely and accurately.
- **Double-check.** Global Trade Compliance will also screen customers and vendors against the list of embargoed countries and government-sanctioned parties to verify that transactions don't involve restricted or sanctioned parties.
- **Ask for help.** Sometimes the regulations, customs and practices of more than one country may govern a particular transaction. Global Trade Compliance is your source of support and answers to questions about any trade compliance questions.



Did you know?

Best Buy is a certified participant in the U.S. Customs and Border Protection's Trusted Trader program known as C-TPAT (Customs & Trade Partnership Against Terrorism). Best Buy is committed to this program and our employees, customers and vendors are expected to follow all C-TPAT security policies and procedures.

Find out more.

- Import/Export Compliance Policy

Compete fairly.

We play by the rules – winning business based on great products and services.

We believe that free and fair competition makes for a thriving marketplace. It also leads to advancements within our industry, innovative products and services and new ways to do business. And that delights our customers. That's why we compete vigorously, but fairly, and let the quality of our products and services – not unethical practices – drive our success.

Every decision. Every day.

- **Outperform our competitors fairly and lawfully.** Comply with antitrust and competition laws. These laws can be complicated, so it's important to understand how they affect the work you do. Ask questions about what's appropriate (and what isn't) and avoid even the appearance of something improper.
- **Respect the free market.** Never agree with competitors, customers or vendors – either formally or informally – to:
  - Raise, set or hold ("fix") prices
  - Divide markets, territories or customers
  - Prevent another company from entering the market
  - Refuse to deal with a particular competitor, supplier or customer
  - Influence the outcome of a competitive bid
  - Restrict production, sales or output
- **Gather competitive intelligence the right way.** It's OK to gather information about our competitors and their customers, suppliers and vendors, but we need to do it legally and ethically. Always use good judgment. Public sources and customer feedback are a good way to do it – but asking for intel about a competitor from a former employee is not.

"Agreeing" includes an understanding that is...

- Stated or implied
- Oral or in writing
- Created directly with another party or indirectly through a third party



What if?

I was attending a trade show and some competitors were discussing confidential information they had obtained about a competitor's pricing. Something about this felt wrong, so I excused myself and left the room. Did I do the right thing?

Yes. Your good judgment prevailed. If discussions arise about pricing or other topics that could restrict trade, make it clear to the others in the room that you believe the discussion is inappropriate, then leave the room immediately.

Working with integrity means making decisions that are, well... good. Not just good in the sense of being smart or sound or profitable. But good in the sense of being honorable, fair and ethical. We win the right way.

Avoid conflicts of interest.

We do what is in the best interest of Best Buy.

Let's face it, we all have interests and relationships outside of our jobs. But when our personal activities create – or appear to create – a conflict between our personal benefit and our Company's benefit, they can erode the trust that people place in us and our Company. Each of us has an obligation to steer clear of conflicts and always act in the best interest of Best Buy. Understanding what conflicts of interest are and when they typically arise is the key to avoiding them.

Every decision. Every day.

- **Recognize a conflict when you see one:** It's not possible to list every scenario in which a conflict can occur, but here are some examples:

You seek a second job with a competitor of Best Buy.	You have a romantic relationship with an employee who reports up through you.	You have a direct or indirect reporting relationship with your best friend from college.	Your brother-in-law works for a vendor, and he supports the Best Buy relationship.	You offer to do some consulting work for a customer "on the side."	You have a financial investment in a competitor that exceeds $25,000.

- **Check our policy for more info and examples.** And be mindful. Conflicts of interest may also arise when family members act in the way described in the examples.
- **Appearances matter.** It's not just about an actual conflict, but the perception of one. If your actions would make others – inside or outside of Best Buy – question your motives or your loyalty to Best Buy, don't do it.
- **Be proactive.** If you believe that an actual or perceived conflict exists, disclose it. Disclosing a potential conflict of interest does not necessarily mean that further action will be necessary. Conflicts can be addressed or avoided if promptly disclosed and properly managed.
- **If you're not sure, ask yourself these questions.** Could my personal interests or relationships influence the decisions that I make? Or could it look that way to someone else? If the answer to either question is yes, then re-think your decision or action. If you're not sure, seek guidance from the Ethics Office.

Did you know?

Gifts and entertainment can pose conflicts of interest, too, when they make it hard for you to be objective about the person or company that provides them – check an **earlier section** to find out more.

Find out more.

- Conflict of Interest Policy

Avoid bribery and corruption.

We win honestly or walk away.

Often, we picture a bribe as an envelope filled with a stack of cash. But a bribe can actually take many forms – a gift, a trip, "free" products, even an internship offer. A bribe is basically anything of value offered in exchange for a favorable business advantage or decision. Remember: No matter what form it takes, a bribe is always wrong, whether you are offering one or accepting one.

Every decision. Every day.

- **Conduct business with integrity.** Bribery laws are complicated and can vary from country to country. But our policy is simple: we prohibit bribery – in all forms, in all places. Don't offer, promise, give or accept a bribe, and don't allow anyone else to offer or accept one for you.
- **Transparency? Absolutely.** To ensure we're conducting business with integrity, maintain books and records with sufficient detail so the nature of anything given or received is clear and accurate.
- **Keep an eye on our vendors.** We can be held accountable for bribes they make on our behalf. So, choose partners who share our high standards, and monitor their performance to make sure they comply with our policies and the law.
- **Beware of gift-giving.** Avoid even the possibility that a business courtesy could be perceived as a bribe. The rules for what you can give to a government official are even more strict – check our Anti-Corruption Policy and reach out to your manager and in-country Legal Department to obtain approval before you offer anything of any value.
- **Don't pay facilitating payments.** They're small payments (sometimes called "grease payments") made directly to low-level government officials to speed up routine government actions.



What if?

You have a great relationship with a physician group that uses our remote-care platform and are thinking about asking them to recommend our products and services to other physicians. In return, you'd pay them a royalty for every referral. Great idea, right?

No. The "royalty" you're proposing is another word for kickback or bribe, both of which are unethical and maybe even illegal. We never want to improperly influence a healthcare provider. So don't offer cash or anything of value to encourage someone to use or recommend our products and services.

A "government official" is defined more broadly than just someone who is elected or appointed to public office.

Other examples include:

- Customs or tax officials
- Regulatory agency officials
- Political candidates
- Military personnel
- Employees of state-owned businesses

Find out more.

- Anti-Corruption Policy



04 Our shareholders.

Protect our assets

Ensure financial integrity

Avoid insider trading

Communicate responsibly

Protect confidential business information

Our shareholders:

We ask our shareholders to put their trust in us. To earn that trust, we must act with integrity and honesty.
Every decision. Every day.

Protect our assets.

We take good care of everything that makes us Best Buy.

Think about the assets you rely on every day. Your Best Buy-issued laptop or phone, the email system and collaboration tooling you access, the supplies you use – our assets include these and everything else our Company owns or uses to conduct business. When you protect them, you're not just helping us get the job done today. You're also helping to support our success in the marketplace tomorrow.

Every decision. Every day.

- **Handle physical assets with care.** Use them in the way they're intended to be used and protect them from theft, fraud, damage and loss. Borrowing, lending, selling or giving them away isn't OK, unless you're authorized to do so.
- **Protect the technology assets that are assigned to you.** Follow our policies to keep your equipment safe and secure. Use only Best Buy-approved hardware, software, applications and storage devices, and make sure the only one who knows your user IDs and passwords is you.
- **Be vigilant and safeguard our systems.** Criminals look for ways to compromise our Company's systems. Stay alert for potential security threats on personal devices and when using Best Buy assets.

Phishing	Smishing	Vishing
Report emails by using the "Report Suspicious" button within the external email banner or forward to phishing@BestBuy.com	**Report texts** by sending a screenshot of the text message with the sender's phone number to CSIRT@BestBuy.com	**Report calls** to CSIRT@BestBuy.com and include details of the exchange

- **Be a good steward.** Be honest, accurate and complete in your expense reporting. Adhere to the Travel and Expense Reimbursement Policy, obtain any necessary approvals and provide any required documentation. And if you're responsible for approving expenses, use the same care in protecting our Company's financial assets as you would your own.
- **Be smart.** The Company has an obligation to monitor our systems and devices (such as a laptop or cellphone) for certain content to protect our customers and employees. Anything you write, download or store on our systems or devices, or transmit on our networks, may be monitored or reviewed by the Company.
- **Honesty pays.** Reporting concerns of theft or related crimes against Best Buy may earn you a cash reward via Honesty Pays.

What if?

I use my Best Buy corporate credit card for personal purchases and then pay for them later – is that OK?

No. It's against our policy to use your corporate credit card for personal reasons. If it happens by mistake, notify your manager and promptly pay the credit card directly for the personal charge.

Our "assets" include:

- Physical assets, such as products and inventory, phones, computers, office supplies, equipment and furnishings.
- Technology assets, such as our email and voicemail systems, internet access, networks, hardware and software.
- Financial assets, such as cash, bank accounts, stocks and credit standing.
- Confidential information is a critical Company asset, too. Check the Keep private information private section and the Protect confidential business information section to find out more.

Did you know?

From generating realistic imagery to composing music or crafting written narratives, the capabilities of generative artificial intelligence (AI) are expanding at an unprecedented pace. However, with great power comes great responsibility and Best Buy has resources to help. Check out our AI Guiding Principles – connecting our use of AI to our purpose and vision – and follow our Responsible GenAI Policy.

Find out more.

- Enterprise Fraud Prevention Policy
- Cybersecurity Policy
- Mobile Device Policy
- Responsible GenAI Policy
- Travel and Expense Reimbursement Policy
- Honesty Pays SOP

Ensure financial integrity.

We ensure that our books and records reflect an accurate picture of our business.

Accurate financial records help us evaluate our performance reliably and exercise strong financial stewardship, both of which help us build trust with our customers, employees, vendors, shareholders and communities. So, we must all play our part in helping to maintain the integrity of our financial records.

Every decision. Every day.

- **Insist on accuracy.** Revenue, expenses, invoices, purchase orders, payroll, tax records, benefit claims, regulatory information – no matter what form a "record" takes, make sure the information you report is accurate, complete and captured in the right period.
- **Be...**
  - **Alert.** Watch for fraud, dishonesty or other suspicious activity such as money laundering, which happens when illegally earned money is run through a legitimate business. Acts like these could undermine the reputation we've earned for doing business honestly and fairly.
  - **Strong.** Never give in to pressure to falsify a record or do (or ignore) something that's unlawful or unethical. No one has the authority to make you engage in behavior that violates our Code.
  - **A good steward.** Make sure the spending you do on behalf of Best Buy results in good value for our Company.



What are some examples of "suspicious activity"?

- Hiding or failing to report financial information
- Overriding, by-passing or falsifying financial controls
- Backdating or altering Company documents
- Falsifying the true nature of a transaction
- Intentionally recording transactions in the wrong accounting period or under the wrong account or department
- Billing – or manipulating information in order to get paid – for products or services we haven't provided
- Involving unrelated parties, such as requesting payments to be made to entities outside of the transaction

What if?

My co-worker suggests waiting to submit an expense claim because we have already reached our budget for this month. Can I just hold onto the expense until next month?

No. Having an accurate picture of our performance is more important than making budget. It's never acceptable to deliberately distort our results. In fact, it's much easier to explain a budget miss than a deliberate falsification of our results.

Find out more.

- Anti-Money Laundering Policy

Avoid insider trading.

We don't buy or sell stock if we are aware of material nonpublic ("inside") information.

As employees, we may be aware of material information about our Company (or companies with which we do business) that isn't known to the public. Knowing this information makes us "insiders," and using this information to buy, sell or reallocate stock or other types of company securities is called "insider trading." Insider trading is illegal. And passing along this information to someone else so they may trade (a practice called "tipping") is also illegal. Insider trading violates the law, our Code, our policies ... and our sense of what's fair.

Every decision. Every day.

- **Know how to identify material nonpublic ("inside") information.** It's both:
  - Material, meaning an investor would consider it important in making a decision to buy or sell Best Buy (or any other company's) stock; and
  - Nonpublic, meaning it hasn't been broadly released to the general public.
- **Respect material nonpublic information.** No trading or tipping on it. You can share it only with co-workers as outlined in our Confidentiality Policy, but never with family, friends or anyone outside of Best Buy.
- **Wait!** If you know that Best Buy is about to make an announcement that could affect the price of our stock (or someone else's), wait at least 24 hours after the announcement is made public before buying or selling. For example, all employees are prohibited from trading in Best Buy stock for one full trading day following the release of quarterly earnings results.
- **Be familiar with trading windows and closed trading periods.** Some people at Best Buy and certain types of stock transactions are subject to additional trading restrictions. Know the rules before you trade.

What if?

I have been planning to buy some additional shares of Best Buy stock, but I heard today that there is a significant change coming in our executive leadership team. I'm not sure if this information has been made public. Can I go ahead and purchase the stock since I had planned to do so before I learned this news?

Intending to purchase before hearing the news is irrelevant. News of an executive leadership change could be material information – it's important that you find out if the information has been made public and whether the window for trading is open. The words "I'm not sure" are a red flag – anytime you're not sure if information is material nonpublic information or whether it's OK to buy or sell, don't take a chance. Seek guidance and, until you're certain, don't trade.

What are some examples that could be "material nonpublic information"?

Information that has not been broadly released to the general public about:

- Mergers or acquisitions
- Significant changes in executive leadership
- New products and services
- Projected financial earnings or losses
- Strategic business plans
- Pending lawsuits

Before trading, review our Securities Trading Policy and ask yourself, am I ...

- Aware of material, nonpublic information?
- Currently subject to a closed trading period?
- Unclear about what's appropriate and legal (and what isn't?)

If the answer to any question is "yes," stop. Check with the Legal Department before proceeding.

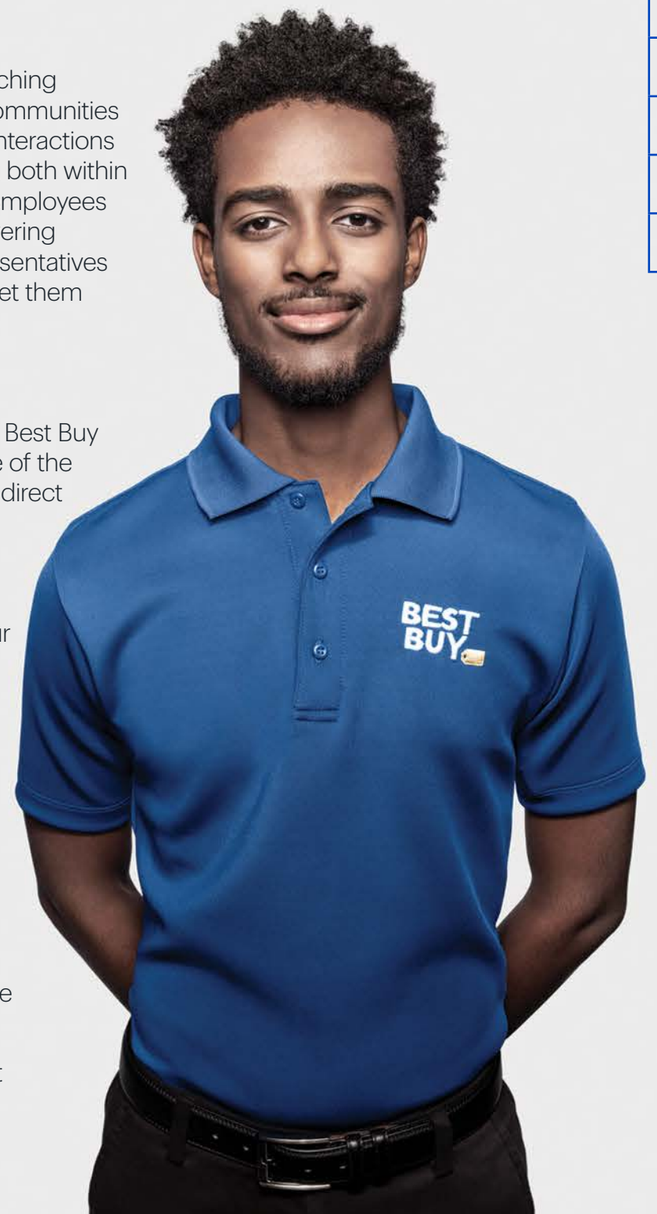
Find out more.

- Securities Trading Policy
- Confidentiality Policy

Communicate responsibly.

We understand that a clear, consistent voice preserves our name and our reputation.

Best Buy is brimming with examples of employees enriching customers' lives through technology, supporting our communities and working together to bring our brand to life. These interactions make us proud and many of us love to talk about them, both within and outside of Best Buy. That's why we have teams of employees who specialize in sharing our Company story and answering questions from the media, investors, government representatives and the general public. So, if you get asked questions, let them provide the answers.



Every decision. Every day.

- **Know where to go.** It's best not to speak on behalf of Best Buy or give the impression that your views represent those of the Company. Unless you're an authorized spokesperson, direct them to the proper resource.
- **Leverage the power of social media.** Our online presence boosts our brand and connects us with customers in new and wonderful ways. Make sure your use – whether personally or as an employee of Best Buy – reflects our Values and is consistent with our Code, our policies and the law. Rules of the (social media) road?
  - Do not post information about our customers or confidential information about our Company
  - Disclose your connection to the Company if you comment on any Company products or services
  - Harassing or discriminatory comments are always wrong – whether on the job, outside of the workplace or online
  - Always remember: You're responsible for the content you publish

For questions...	Contact...
From reporters and the media	Press@BestBuy.com
From the government	GovernmentAffairs@BestBuy.com
About financial matters	Investors@BestBuy.com
About charitable donations	SocialImpact@BestBuy.com
About making speeches or participating in events	Communications@BestBuy.com

Have fun while being the best.

Find out more.

- Confidentiality Policy
- News Media Policy
- Social Media Policy

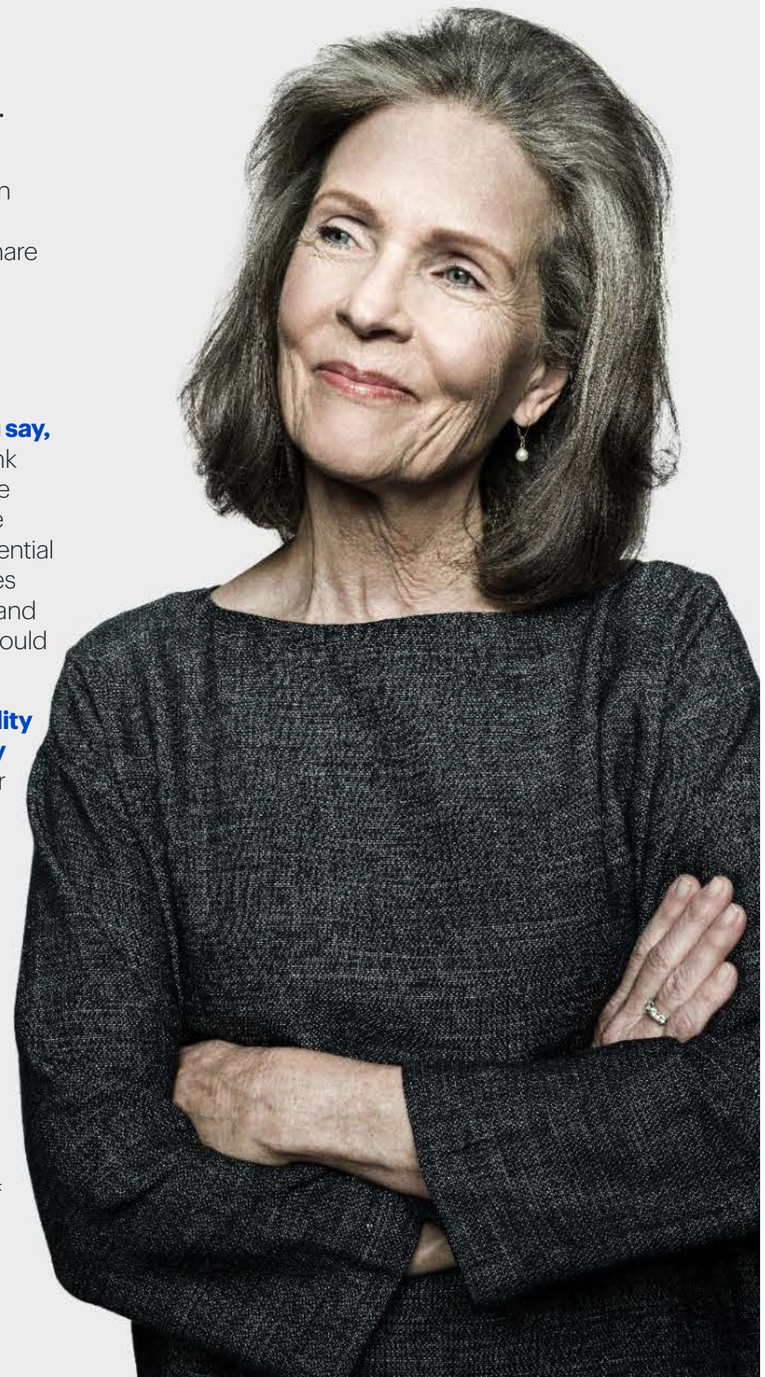
Protect confidential business information.

We do our part to prevent unauthorized use or disclosure.

As a Company, the data we collect and information we create helps us gauge where we've been and where we're going. But it does more than that. It also helps us make better products and services, explore game-changing technologies and reach new customers and markets. If we share this information with the wrong person – even accidentally – the risks to the Company could be significant. That's why safeguarding it is so important.

Every decision. Every day.

- **Know what business information should be kept confidential.** Examples include:
  - **Intellectual property** – our ideas, creative work, designs and know-how that represent a significant investment in our time and resources resulting in intangible property such as trademarks, trade secrets, patents and copyrights
  - **Proprietary information** about our Company, such as business plans, marketing strategies and customer lists
  - **Financial information** related to our Company's performance, including budgets, forecasts and holiday results
- **Follow our information classification standards and records management policies.** They will help you label, handle, store and dispose of information the right way.
- **Think before you share.** Unless information is designated as public information – like live sale prices on BestBuy.com – don't share it with anyone inside or outside of Best Buy unless they have a legitimate business need to know it. That includes third parties, like suppliers and vendors. Make sure they have the right legal protections, such as a non-disclosure agreement, in place before you share with them.
- **Watch not only what you say, but where you say it.** Think others can't hear you in the elevator? Think again. Take care not to discuss confidential information in public places like restaurants, airports – and elevators – where others could hear.
- **Respect the confidentiality and intellectual property rights of others, too.** Your responsibility extends to any information that vendors share with us.
- **Honor your confidentiality obligations, even if you leave Best Buy.** Never share our confidential information with other employers. For the same reasons, don't ask or expect new Best Buy employees to share the confidential information of former employers with us.



Did you know?

Personal information about people, including co-workers and customers is confidential, too, and there are strict laws, as well as our own policies, about how we collect, manage and protect it – make sure you know the rules (see **Keep private information private**). And the recommended actions that you learn about here apply to personal information as well.

Find out more.

- Confidentiality Policy
- Customer Information Policy
- Information and Records Management Policy
- Cybersecurity Policy



05 Our communities.

Protect the environment

Engage responsibly in political activities

Make a positive impact

Our communities:

If our Company is to thrive, then the communities in which we operate must also thrive. We have a responsibility and commitment to make a positive impact in them. We do this by preparing youth from areas of concentrated poverty for tech-reliant jobs and serving as a steward of the environment.

Protect the environment.

We aspire to drive the circular economy forward.

We are committed to protecting the planet, conserving natural resources and preventing pollution. We do this through designing waste, pollution and inefficiencies out of our business model, and building sustainability and renewable energy in. Through promoting energy-efficient products and sustainability initiatives, we are working to meaningfully reduce our impact on the environment and help our customers do the same.

Every decision. Every day.

- **Minimize our environmental footprint.** Reduce, reuse and recycle wherever you can. When materials are no longer needed, do your part and follow our SOP to properly dispose of them.
- **Help customers live more sustainably.** Continue providing information to our customers that helps them make more sustainable choices, like our wide array of ENERGY STAR® certified products that save energy, reduce water usage and lower carbon emissions.
- **Support our recycling program.** Our e-waste recycling program helps solve a customer need and keeps waste out of landfills. Our trade-in and repair services also help the environment by extending the life of technology. Make sure our customers know about these services and handle recycled product carefully – it often still has value!
- **Speak up.** Report any actual or potential environmental hazards immediately.

What if?

I have some ideas for how to use less paper in our facility. Who should I talk to?

We welcome any ideas for lessening our environmental impact. Explore your ideas with your manager to see if they can be implemented at your location and email EnvironmentalServices@BestBuy.com.

Did you know?

We're at the forefront of eliminating e-waste!

Since 2009, Best Buy has voluntarily operated the most comprehensive e-waste recycling collection service in the U.S. and has collected more than 3 billion pounds of consumer electronics and appliances for recycling.

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Back
Open & Honest Ethics Line

Find out more.

- Chemical Management Statement
- Climate Change Statement
- Environmental Statement
- Environmental Sustainability
- Recycling
- ENERGY STAR®

Engage responsibly in political activities.

We respect and support everyone's right to participate in the political process.

Best Buy encourages you to exercise your civic duty, both personally and professionally, and to support the political causes you're passionate about. Just keep in mind: your personal politics are your business, and therefore, should be kept separate from what you do at Best Buy.

Every decision. Every day.

- **Keep your personal political activities personal.** Follow all applicable laws and our policies related to your individual participation in political affairs. Whether you're donating time or money or providing an opinion, make sure it's clear that your involvement is personal and not on behalf of Best Buy. And unless you receive approval in advance, don't use or donate Best Buy assets (like our copiers, your laptop or Company time) for your political activities.
- **For corporate political activities, let Government Affairs take the lead.** The Best Buy Government Affairs team is responsible for all lobbying activities done on our Company's behalf and for communicating with government officials and policy makers about public policy initiatives. Sometimes the team reaches out to employees for grassroots support on issues. But your participation is voluntary – don't feel pressured or obligated to join in. And unless our Company contacts you, please don't engage in any lobbying activities on our behalf.
- **Be a thoughtful and informed voter.** We promote the importance of voting through our non-partisan Turn Up the Vote initiative. Exercise your right to vote and talk to your manager about the time you need in order to minimize disruption to work schedules on Election Day.

Did you know?

The Best Buy Employee Political Forum (PAC) allows eligible employees to voluntarily donate personal funds to collectively support political candidates who understand issues important to Best Buy and the retail industry. **But...**

- There are strict rules and reporting requirements around contributions and donations of products or services, so don't jump in until you've talked to **Government Affairs**
- Neither Best Buy nor the PAC will reimburse you for any political contributions you make to political candidates, parties or issues



What if?

I have a good friend who is running for political office and has asked if I would endorse her at a rally being held outside work hours. Is that a problem?

No. Just be sure to make it clear that your endorsement is your own personal action and that you're not speaking on behalf of Best Buy. If the rally or other campaign volunteer event is during work hours, be sure to use your PTO.

Find out more.

- Political Activity and Government Affairs Policy
- U.S. Political Activity & Public Policy Report

Make a positive impact.

We unleash the power of our people to make a difference.

Best Buy is committed to making a positive impact in the world and in the places where we live and work. Examples abound of our employees volunteering in the community – mentoring youth at Best Buy Teen Tech Centers, teaching classes through Geek Squad Academy and making contributions of time and money to their favorite charities.

Every decision. Every day.

- **Volunteer at the corporate level.** Join your team members to make an impact in communities across the country. Initiatives like our Best Buy Teen Tech Centers and the annual Best Buy Month of Service provide opportunities to give back. We support any employee who wishes to engage in Company-sponsored volunteer events, but we always understand that other priorities exist. Find out how you can get involved at Best Buy for Good or contact BlueGivesBack@BestBuy.com.
- **Volunteer on a personal level.** We support your personal efforts to make the world a better place, and we celebrate your outreach to people and causes that matter to you. To support your volunteer efforts, through our Volunteer Match Award program we will award grants of $100 for every 10 hours you volunteer with an eligible nonprofit, up to $1,000 per year, and $500 anytime 10 or more Best Buy employees volunteer for two hours or more. Hours must be logged at Best Buy for Good. Want to know more? Our Guide to Group Volunteer Events is your resource for planning a meaningful nonprofit volunteer experience. Just make sure any volunteer activities you undertake are lawful and don't create a conflict of interest with the work you do at Best Buy. And remember – unless you get prior approval from the Social Impact team – don't use the Company's name, funds or resources to support your events or activities.
- **Give.** Together, we can make an even bigger impact! If you donate to eligible 501(c)(3) organizations and schools of your choice through the Employee Giving Program at Best Buy for Good – anytime during the year – Best Buy will provide a 40 percent match. And employee donations to the Best Buy Foundation are matched year-round at 100 percent. Keep in mind, pressuring or asking customers, vendors or co-workers to support your favorite charities during working time is not permitted.
- **Inform.** Share information about the Company's social impact efforts to build brighter futures through teens and technology with any organization that might be a good fit – learn more at BestBuyFoundation.org.



Volunteer.
Give.
Inform.

Find out more.

- Social Impact
- Charitable Donation Policy

Today’s behavior is tomorrow’s reputation.

As you think about and apply this Code, I encourage you to reflect on the possibilities and power inherent in a single decision.

Think about the hundreds of decisions you make and interactions you have every day on the job. The right decisions and interactions – the ones that reflect our Purpose, Vision and Values – help us better serve the millions of customers who come into our stores, shop with us online or welcome us into their homes and businesses. They also help us build confidence in our products and services as well as trust in our Company.

Never underestimate the ability you have to make a difference – because every decision you make and interaction you have affects who we are and where we go from here. Today’s behavior is tomorrow’s reputation. So, use our Code to help you in your work at Best Buy. And remember, my team and your leaders are here to help answer any questions you have along the way.

We are better together. As we continue to work on growing our business and unleashing the possibilities for our future, I am grateful for the commitment we all make to be **At our best. Every decision. Every day.**



Keri Grafing
Vice President, Chief Compliance Officer



BEST BUY™

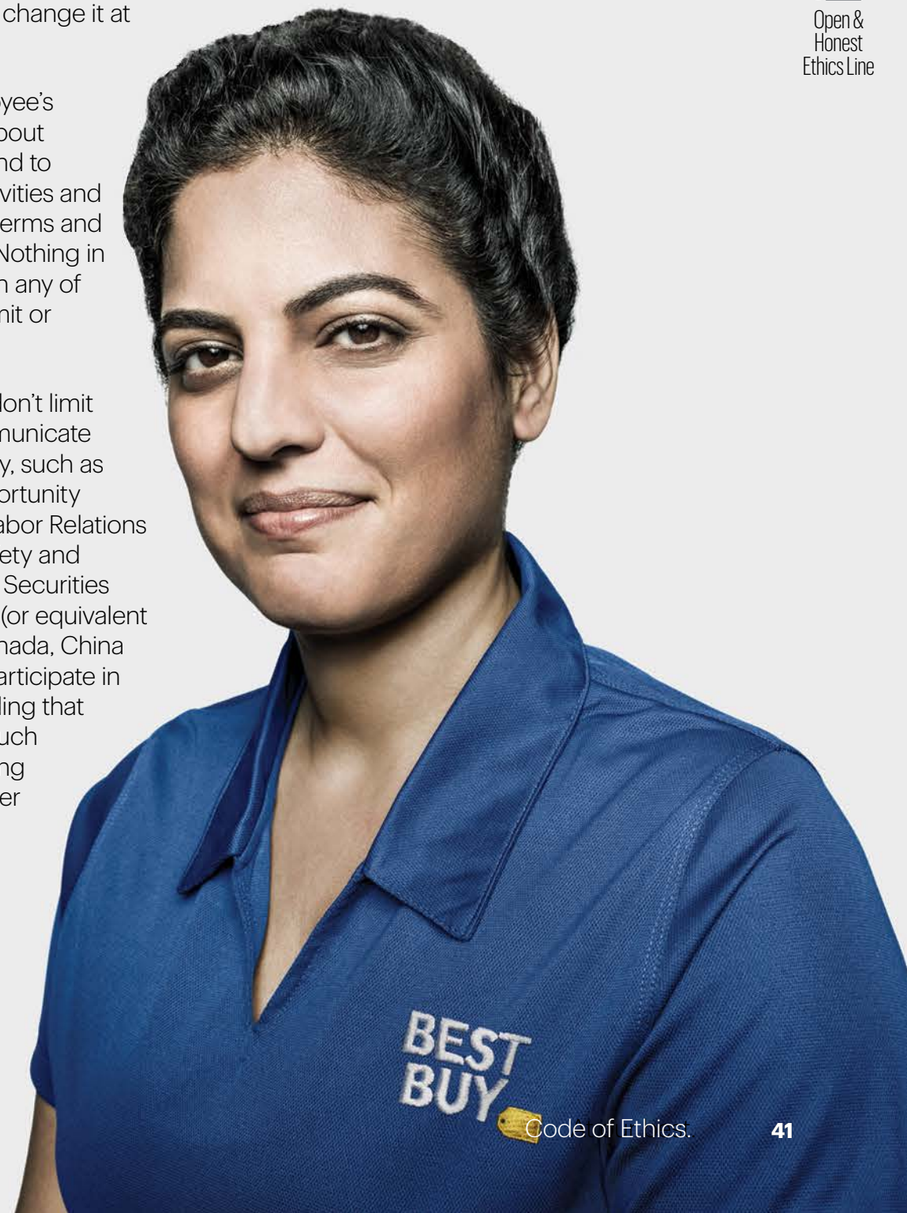
Additional resources.

Contact	Contact Information
Best Buy Customer Support	BestBuy.com/support, 888-237-8289
Corporate Security	CorporateSecurity@BestBuy.com
Emergency Hotline	1-855-229-4911, Option 4
Employee Relations	1-866-MY BBY HR EmployeeRelations@BestBuy.com
Enterprise Privacy	EnterprisePrivacy@BestBuy.com
Environmental Services	EnvironmentalServices@BestBuy.com
Ethics Office	Ethics@BestBuy.com
Global Trade Compliance	USImportCompliance@BestBuy.com ExportCompliance@BestBuy.com
Government Affairs	GovernmentAffairs@BestBuy.com
Human Resources	1-866-MY BBY HR
Investor Relations	Investors@BestBuy.com
Legal Department	AskLegal@BestBuy.com
Open & Honest Ethics Line	BestBuyEthics.com 1-833-BBY-OPEN (U.S. and Canada) 400 120 1942 (China) 00801 49 1703 (Taiwan) 122.80.390 or (0) 284 458 1407 (Vietnam) 000-800-050-3898 (India)
Procurement+	AskProcurement@BestBuy.com
Product Safety	ProductSafety@BestBuy.com
Public Relations	Press@BestBuy.com
Safety	Safety@BestBuy.com
Social Impact	BlueGivesBack@BestBuy.com

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September 9, 2026