

## **SpartanNash Company**

### **Shareholder Communications Policy**

#### **Introduction**

The Board of Directors (the “Board”) of SpartanNash Company (the “Company”) has the responsibility to oversee the management of the Company and to enhance the long-term value of the Company for its shareholders. The Board has adopted the guidelines set forth in this Shareholder Communication Policy (the “Policy”) to ensure that its shareholders have access to the Board. This Policy is intended to provide a process for shareholders to send communications to the Board and to individual directors. It is the policy of the Company to facilitate communications of shareholders with the Board, Committees of the Board and individual directors. The Board may modify this Policy from time to time.

The Board will give appropriate attention to written communications on issues that are submitted by shareholders and other interested parties, and will respond if and as appropriate. Absent unusual circumstances, the Secretary of the Company will: (1) be primarily responsible for monitoring communications from shareholders and other interested parties; and (2) provide copies or summaries of such communications to the Board.

#### **Content of Communications**

All communications must be accompanied by the following information:

- If the person submitting the communication is a shareholder, a statement of the number of shares of the Company that the person holds;
- If the person submitting the communication is not a shareholder, the nature of the person’s interest in the Company;
- Any special interest, meaning an interest not in the capacity of a shareholder of the Company, of the person in the subject matter of the communication; and
- The address, telephone number and e-mail address, if any, of the person submitting the communication.

The Secretary of the Company shall have discretion to screen and not forward to directors communications that the Secretary determines in his or her discretion to be communications unrelated to the business or governance of the Company and its subsidiaries, commercial solicitations, offensive, obscene or otherwise inappropriate. Examples of communications that are not appropriate for delivery to directors under these procedures include:

- Communications regarding individual grievances or other interests that are personal to the party submitting the communication and could not reasonably be construed to be of concern to security holders or other constituencies of the Company (such as employees, members of the communities in which the Company operates its businesses, customers and suppliers);

- Communications that advocate the Company's engaging in illegal activities;
- Communications that, under community standards, contain offensive, scurrilous or abusive content; and
- Communications that have no rational relevance to the business or operations of the Company (it being understood, however, that issues of social concern arising by reason of the business and operations of the Company are not intended to be excluded under this criterion).

### **Delivery Procedures**

Communications to the Board or to individual directors must be in writing and should not exceed 500 words in length, excluding the information required to accompany the communication under these procedures. The communication should be sent to the Secretary of the Company at the following address:

SpartanNash Company  
 Attn. Shareholder Communications  
 c/o Corporate Secretary  
 GR761214  
 P.O. Box 8700  
 Grand Rapids, Michigan 49518-8700

### **Review of Communications by Corporate Secretary**

Upon receipt, each communication shall be entered into an intake record maintained for this purpose, including the name of the person submitting the communication, the date of receipt of the communication, and a brief statement of the subject matter of the communication. The record shall also indicate the action taken with respect to the communication, as prescribed by this Policy.

An acknowledgment of receipt should be sent to each person submitting a communication. The acknowledgement may indicate that communications appropriate for delivery to the Board or individual directors under these procedures will be so delivered, but that it is not the practice of the Board or individual directors to respond individually to the communications.

The Secretary of the Company, or the Secretary's delegates, shall review each communication to determine whether:

- The communication satisfies the procedural requirements for submission under these procedures; and
- The substance of the communication is of a type that is appropriate for delivery to the directors under the criteria set forth herein.

If a communication does not conform to the procedural requirements of these procedures, the communication shall be returned to the person submitting the communication, together with a brief explanation of the defect(s).

The Secretary of the Company, or the Secretary's delegates, shall determine whether the substance of a communication is not of a type that is appropriate for delivery to the Board or individual directors under these procedures. If a communication is not presented because it is not appropriate for

delivery under these procedures, the communication must nonetheless be made available to any director to whom it was directed and who wishes to review it.

Communications determined to be appropriate for delivery, shall be assembled by the Secretary of the Company, or the Secretary's delegates, for delivery. The assembled communications shall be delivered to the Board and individual directors on a periodic basis, generally in advance of each regularly scheduled meeting of the Board. The periodic deliveries of the assembled communications shall be organized chronologically, topically or in some other fashion designed to facilitate the directors' review of the communications. The Secretary of the Company, or the Secretary's delegates, may accompany the communications with relevant materials or analyses, together with any recommendations of management, that may be useful to the directors in the consideration of the communications.

If so instructed by the Chairman of the Board, communications directed to the Board as a whole, but relating to the area of competence of one of the Board's committees, shall be delivered to that committee, with a copy to the Chairman.

### **Other**

The Company's acceptance and forwarding of a communication to the Board or any member or members of the Board does not imply that the directors owe or assume any fiduciary duty to the person submitting the communication, all such duties being only as prescribed by applicable law.

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