



CONTRACTOR CODE OF CONDUCT

(April 21, 2008)

CVS/pharmacy recognizes that successful operation of its store development program requires use of qualified and reputable contractors and subcontractors. CVS believes it is important that our construction contractors be responsible citizens and share in our philosophy concerning matters of social, environmental, and working conditions.

We strive to build relationships with reputable and qualified contractors that share our commitment to promote good practices. We expect all of our construction contractors to respect fundamental human rights, to provide reasonable and healthy working conditions, and to treat their workforces fairly, with dignity and respect. Therefore, we developed this contractor code of conduct.

To function as one of our construction contractors, each contractor must accept the following general responsibilities and maintain the minimum standards set forth below regarding conditions of employment for employees assigned to CVS properties. In addition, contractors must commit to communicating this Code of Conduct to their subcontractors. We require adherence to these expectations as a condition of all construction contractors' ongoing relationships with CVS.

1. We are committed to fair treatment and equal employment opportunities.

We recognize, respect, and support an employee's legitimate expectation to be treated fairly and the right to equal employment opportunity. Accordingly, contractors shall implement and maintain a clear and effective complaint resolution process for their employees. All contractor employees should be able to work in an environment free of harassment and unlawful discrimination by another employee or supervisor. Contractors shall comply with all applicable laws and CVS policy prohibiting discrimination.

2. Contractor's employees assigned to CVS properties shall be offered competitive compensation and benefits.

Wages and conditions of work offered by contractors shall be competitive within each respective market. Contractors shall determine the appropriate wage rates and wage progressions offered to each employee within the market-specific wage ranges; however, contractors shall pay at least the minimum wage required by state and federal law and we encourage contractors to pay employees a decent wage. Additionally, all benefits required by federal, state and local laws and regulations must be provided.



3. We expect compliance with the law and encourage our contractors to exceed minimal legal requirements.

Contractors shall follow the governing federal, state, and local laws regarding wages, benefits, hours of work, overtime, meal and break periods, safety, and those governing rights and responsibilities with respect to all other aspects of work and working conditions. We encourage contractors to look for opportunities to provide and develop human resource policies and programs designed to establish them as "employers of choice."

Contractors shall possess all applicable business, contractor, and/or trade licenses or other appropriate licenses or certifications required by applicable state or local law. Contractors shall not have had such a license suspended within the past five years.

4. We care for the environment.

Contractors must always strive to minimize potential damaging effects to the environment. Accordingly, contractors shall strive to reduce adverse environmental impacts by reducing waste and emissions to air, ground, and water; handling, storing, and disposing of hazardous waste in a legally and environmentally safe manner; and recycling, as appropriate, used products and other material.

5. We partner with women- and minority-owned suppliers

We look forward to the opportunity to work with qualified women- and minority-owned contractors, sub-contractors, and vendors — as well as those with high minority representation, and we value their unique contributions to the overall process.

6. We support companies that, like CVS, in turn support the communities in which they live.

We believe that contractors who adhere to this Code of Conduct, particularly as to compensation and benefits, the environment, and partnership with women- and minority-owned suppliers, support and contribute to the growth of the local community in which our employees and customers live.

We encourage contractors to utilize local building trades and craft-training programs to develop skilled trade workers for the future. For example, we value participation in programs that enable former members of the military to transition from any branch of the armed forces to the building trades, or to train urban youth in vocational training programs.

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We reserve the right to audit compliance with these expectations, periodically, and contractors agree to cooperate in all such reviews. If and when we determine that one or more areas need improvement, contractors agree to work with us toward achieving full compliance with these standards as efficiently as possible.