sweetgreen

CODE OF BUSINESS CONDUCT AND ETHICS

In furtherance of our mission of inspiring healthier communities by connecting people to real food, Sweetgreen, Inc. (the "**Company**") has a set of Core Values that embody our culture, spirit, and dedication to doing what's right. They keep us aligned and help us make decisions about everything from the food we serve to the way we design our stores. Acting ethically is at the foundation of everything we do. This means having a Code of Business Conduct and Ethics (this "**Code**") that is consistent with our vision and in line with our Core Values.

We count on our employees, consultants, contractors, officers, and directors to commit to and uphold our high standards of integrity and operating principles to further our Core Values:

Win, Win, Win

Create solutions where the customer,
the community, and the Company win together.

Start with the Customer

All of the answers are in our restaurants.

Build for Tomorrow

Push beyond the status quo with imagination and grit.

Keep it Real

Cultivate authentic food and relationships.

Own It

Take 100% responsibility for achieving the mission profitably.

Add the Sweet Touch

Turn every interaction into a memorable experience.

These Core Values come to life every day in our restaurants and in our Sweetgreen Support Center, both with our guests and with our teams, and we always want you to keep it real with us. If you are aware of a suspected or actual violation of this Code, in furtherance of our Core Values, you have a responsibility to promptly report it in accordance with Section 16 of this Code. The Compliance Officer (as defined below) will investigate all reported possible code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. We call this our Open-Door Policy and we protect it because we know how important it is to be able to speak candidly. Even though it is incredibly important, the Open-Door Policy doesn't mean that every complaint can be resolved to your satisfaction. It does mean we are committed to always listening.

Introduction

This Code reflects business practices we are committed to and principles of behavior that support this commitment. We expect every employee, consultant, contractor, officer, and director to not only read, understand, and comply with the business practices and principles described below, but to also apply good judgment and the highest personal ethical standards in making business decisions. Please remember you should consider not only your own conduct, but also that of your family members, significant others, and other people in your household. References in the Code to employees are intended to cover officers and, as applicable, directors.

This Code is intended to meet the requirements for a code of ethics under the Sarbanes-Oxley Act of 2002 and the listing standards of the New York Stock Exchange ("**NYSE**"), and is specifically applicable to the Company's principal executive officer, principal financial officer, principal accounting officer, and controller, or persons performing similar functions.

Officers, managers, and other supervisors are expected to develop in employees a sense of commitment to the spirit, as well as the letter, of this Code. Supervisors are also expected to ensure that all consultants and contractors conform to Code standards when working for or on behalf of the Company. The compliance environment within each supervisor's assigned area of responsibility will be an important factor in evaluating the quality of that individual's performance. Nothing in this Code alters the at-will employment policy of the Company, if applicable. In particular, our employees and officers are subject to an Employee Handbook with the Company (the "**Employee Handbook**"), which should be read in parallel with this Code. However, it is the responsibility of each employee, officer, and director to apply common sense, together with their own highest personal ethical standards, in making business decisions where there is no stated guideline in this Code.

Action by members of your immediate family, significant others, or other persons who live in your household (referred to in this Code as "**family members**") also may potentially result in ethical issues to the extent that they involve the Company's business. For example, acceptance of inappropriate gifts by a family member from one of our partners or suppliers could create a conflict of interest and result in a Code violation attributable to you. Consequently, in complying with this Code, you should consider not only your own conduct, but also that of your immediate family members, significant others, and other persons who live in your household.

Do not hesitate to ask questions about whether certain conduct may violate the Code, to voice concerns, or to seek to clarify gray areas. You should also be alert to possible violations and report them without fear of retaliation in accordance with the Employee Handbook (if applicable). See Section 16 below for instructions on how to ask questions or report potential violations.

Any employee who violates the standards in this Code may be subject to disciplinary action, that, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

While this Code covers a wide range of business conduct, it is not the only document that addresses the conduct of our employees, consultants, contractors, officers, and directors. The Company's Employee Handbook includes policies relating to, among other things, discrimination, harassment, and retaliation prevention. If you have any questions about whether your behavior or any behavior you observe is appropriate, it is your responsibility to ask.

After carefully reviewing this Code, you must sign the acknowledgment attached as **Exhibit A** hereto, indicating that you have received, read, understand, and agree to comply with this Code. The acknowledgment must be returned either electronically in a manner provided for by the Company, or to the Chief Legal Officer (the "**Compliance Officer**") or other person designated as the Company's Compliance Officer (as further described in Section 16) or such Compliance Officer's designee, within ten (10) business days of your receipt of this Code and on an annual basis as the Company may require.

This Code makes reference to certain separate policies, procedures, and handbooks that apply to the Company's employees. These separate policies, procedures, and handbooks, which may differ by business area and jurisdiction, are not part of this Code, but are developed to support and reinforce the principles set forth in this Code. These various separate policies and standards can be accessed electronically through the SG Support application in your Sweetgreen Apps Dashboard or by request to the Compliance Officer.

1. Honest and Ethical Conduct

It is our policy to promote high standards of integrity by conducting our affairs in an honest and ethical manner. The Company's integrity and reputation depends on the honesty, fairness, and integrity brought to the job by each person associated with us. Unyielding personal integrity and sound judgment is the foundation of corporate integrity.

2. Legal Compliance

Obeying the law is the foundation of this Code. Our success depends upon each employee operating within legal guidelines and cooperating with local, national and, if applicable, international, authorities. We expect employees to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. We hold periodic training sessions for the applicable employees, officers, or directors, to ensure that all employees comply with the relevant laws, rules, and regulations associated with their employment, including laws prohibiting insider trading (which are discussed in further detail in Section 3 below). While we do not expect you to memorize every detail of these laws, rules, and regulations, we want you to be able to determine when to seek advice from others. If you do have a question in the area of legal compliance, it is important that you not hesitate to seek answers from your supervisor or the Compliance Officer.

Violation of domestic or foreign laws, rules, or regulations may subject an individual, as well as the Company, to civil and/or criminal penalties. You should be aware that conduct and records, including emails, are subject to internal and external audits and to discovery by third parties in the event of a government investigation or civil litigation. It is in everyone's best interests to know and comply with our legal obligations.

3. Insider Trading

Directors, officers, employees, and consultants who have access to confidential (or "inside") information are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business. All non-public information about the Company or about other publicly traded companies with which we have business relationships is considered confidential information. To use material, non-public information in connection with buying or selling securities, including "tipping" others who might make an investment decision on the basis of this information, is both unethical and illegal. "Material" information is information that would influence a reasonable investor to buy or sell a company's securities. "Non-public" means any information not yet publicly disseminated and sufficiently absorbed by the public. Employees must exercise the utmost care when handling material nonpublic information. Please refer to the Company's Insider Trading Policy for more detailed information.

4. International Business Laws

Employees, consultants, contractors, officers, and directors are expected to comply with the applicable laws in all countries to which they travel, in which they operate, and where we otherwise do business, including laws prohibiting bribery, corruption, or the conduct of business with specified individuals, companies, or countries. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. Please also refer to the Company's Anti-Corruption Policy.

5. Antitrust

Antitrust laws are designed to protect the competitive process and impose severe penalties for certain types of violations, including criminal penalties. These laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. Antitrust laws generally prohibit:

- agreements, formal or informal, with competitors that harm competition or customers, including price fixing and allocations of customers, territories, or contracts;

- the exchange of competitively sensitive non-public information with competitors;

- agreements, formal or informal, that establish or fix the price at which a customer may resell a product; and

- the acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct.

Certain kinds of information, such as our strategies, business plans, budgets, forecasts, financial and operating information, pricing, and production and inventory information, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social.

Antitrust laws impose severe penalties for certain types of violations, including criminal penalties and potential fines and damages of millions of dollars, which may be tripled under certain circumstances. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your supervisor or the Compliance Officer whenever you have a question relating to these laws.

6. Environmental Compliance

Federal law imposes criminal liability on any person or company that contaminates the environment with any hazardous substance that could cause injury to the community or environment. Violation of environmental laws can involve monetary fines and imprisonment. We expect employees to comply with all applicable environmental laws when conducting the business of the Company.

It is our policy to conduct our business in an environmentally responsible way that minimizes environmental impacts. We are committed to minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies.

7. Conflicts of Interest

Our value of Keep it Real supports the cultivation of authentic food and relationships. This value is one rooted in our culture at the Company where collaboration and sharing work experiences within our Sweetgreen community is constant and encouraged. At the same time, employees should avoid conflicts of interest that occur when their personal interests may interfere in any way with the performance of their duties or the best interests of the Company. A conflicting personal interest could result from an expectation of personal gain now or in the future or from a need to satisfy a prior or concurrent personal obligation.

We expect our employees, officers, and directors to be free from influences that conflict with the best interests of the Company or might deprive the Company of their undivided loyalty in business dealings. Even just the appearance of a conflict of interest can be damaging. Accordingly, employees must exercise the utmost care when handling potential or actual conflicts of interest. Whether or not a conflict of interest exists can be unclear. If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director, please refer to the Conflicts of Interest Policy in the Company's Employee Handbook. Officers and directors of the Company may seek authorizations and determinations in accordance with the Conflicts of Interest Policy from the Nominating and Corporate Governance Committee (the "**Nominating Committee**") of the Company's Board of Directors (the "**Board**"), or such other committee of the Board that the Board may expressly designate. Please refer to the Company's Conflicts of Interest Policy in the Company's Employee Handbook for more detailed information.

8. Corporate Opportunities

You may not take personal advantage of opportunities for the Company that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information, unless authorized by your supervisor, the Compliance Officer, or the Nominating Committee. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be pre-approved. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way.

9. Maintenance of Corporate Books, Records Documents and Accounts; Financial Integrity Public Reporting

The integrity of our records and public disclosure depends upon the validity, accuracy, and completeness of the information supporting the entries to our books of account. Therefore, our corporate and business records should be completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results or test results, is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees, and others with whom we do business. As a result, it is important that our books, records, and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs, and expenses, as well as all transactions and changes in assets and liabilities. We require that:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- employees comply with our system of internal controls; and
- no cash or other assets be maintained for any purpose in any unrecorded or "off-the-books" fund.

Our accounting records are also relied upon to produce reports for our management, stockholders, and creditors, as well as for governmental agencies. In particular, we rely upon our accounting and other business and corporate records in preparing the periodic and current reports that we file with the Securities and Exchange Commission (the "**SEC**"). Securities laws require that these reports provide full, fair, accurate, timely, and understandable disclosure and fairly present our financial condition and results of operations. Employees who collect, provide, or analyze information for or otherwise contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about the Company that would be important to enable stockholders and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting and disclosures. All employees, consultants, and contractors are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility and for the timely notification to senior management of financial and non-financial information that may be material to the Company. In addition:

- no employee may take or authorize any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC, or other applicable laws, rules, and regulations;
- all employees must cooperate fully with our Finance and Accounting Department, as well as our independent public accountants and counsel, respond to their questions with candor, and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with the SEC, are accurate and complete;
- no employee, officer, director, or person acting under their direction, may coerce, manipulate, mislead, or fraudulently influence our Finance and Accounting Department, our independent public accountants, or our counsel; and
- no employee, officer, or director should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects.

Any employee or director who is subject to a document preservation notice, or "legal hold," must refrain from deleting or destroying any documents or business records covered by the legal hold. Legal holds are an exception to the routine records management and retention practices of the Company.

Any employee who becomes aware of any departure from these standards has a responsibility to report their knowledge promptly to a supervisor, the Compliance Officer, the Audit Committee of the Board (the "**Audit Committee**"), or otherwise in accordance with the provisions of the Company's Whistleblower Policy on reporting complaints regarding accounting and auditing matters. You can also submit a report on AllVoices, which is the Company's anonymous reporting and feedback hotline, by submitting a report through the AllVoices application in your Sweetgreen Apps Dashboard, by navigating to https://sweetgreen.allvoices.co/ on your web browser, or by calling 866-388-1915 (toll free).

10. Fair Dealing

Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Statements regarding the Company's services must not be untrue, misleading, deceptive, or fraudulent. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your supervisor or the Compliance Officer, as further described in Section 16 below.

You are expected to deal fairly with our customers, suppliers, employees, and anyone else with whom you have contact in the course of performing your job. Be aware that the Federal Trade Commission Act provides that "unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful." It is a violation of the Federal Trade Commission Act to engage in deceptive, unfair, or unethical practices and to make misrepresentations in connection with sales activities.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service, and reputation, and not on the receipt of special favors.

11. Gifts and Entertainment

Business gifts and entertainment are meant to create goodwill and sound working relationships and not to gain improper advantage with customers or facilitate approvals from government officials. The exchange, as a normal business courtesy, of meals or entertainment (such as tickets to a game or the theatre or a round of golf) is a common and acceptable practice as long as it is not extravagant (typically, in excess of $250). Unless express permission is received from a supervisor, the Compliance Officer, or the Audit Committee, gifts and entertainment cannot be offered, provided, or accepted by any employee unless consistent with customary business practices and not (a) of more than token or nominal monetary value (typically, in excess of $250), (b) in cash, (c) susceptible of being construed as a bribe or kickback, (d) made or received on a regular or frequent basis, or (e) in violation of any laws. This principle applies to our transactions everywhere in the world, even where the practice is widely considered "a way of doing business." Employees should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. Our customers, suppliers, and the public at large should know that our employees' judgment is not for sale.

Under some statutes, such as the U.S. Foreign Corrupt Practices Act, giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. As noted in our Anti-Corruption Policy, you must first obtain pre-approval as specified in the policy prior to providing anything of value to a government official, whether foreign or domestic. If you are uncertain about the appropriateness of any proposed entertainment or gifts, you should consult with your supervisor or the Compliance Officer.

12. Company Assets

All employees, officers, and directors are expected to protect our assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on our profitability. Our property, such as kitchen and other restaurant equipment, office supplies, computer equipment, buildings, and products, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. You may not, however, use our corporate name, any brand name or trademark owned or associated with the Company, or any letterhead stationery for any personal purpose.

You may not, while acting on behalf of the Company or while using our computing or communications equipment or facilities, either:

- access the internal computer system (also known as "hacking") or other resource of another entity without express written authorization from the entity responsible for operating that resource; or

- commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (also known as "spam") or material of objectionable content in violation of applicable law, trafficking in contraband of any kind, or any kind of espionage.

If you receive authorization to access another entity's internal computer system or other resource, you must make a permanent record of that authorization so that it may be retrieved for future reference, and you may not exceed the scope of that authorization.

Unsolicited bulk email is regulated by law in a number of jurisdictions. If you intend to send unsolicited bulk email to persons outside of the Company, either while acting on our behalf or using our computing or communications equipment or facilities, you should contact your supervisor or the Compliance Officer for prior approval.

It is extremely important that you take all necessary measures to ensure the security of your computer and any computer passwords. You must use caution when sending sensitive or confidential information in any messages that are widely distributed or sent outside of the Company. If you have any reason to believe that your password or credentials have been compromised, then you must inform your supervisor or the Compliance Officer immediately.

All data residing on or transmitted through our computing and communications facilities, including email and word processing documents, is the property of the Company and subject to inspection, retention, and review by the Company, with or without an employee's or third party's knowledge, consent, or approval, in accordance with applicable law. Any misuse or suspected misuse of our assets must be immediately reported to your supervisor or the Compliance Officer.

13. Confidentiality

As an employee, officer, or director of the Company, you may learn information about the Company or other companies that is confidential and proprietary. You must take care to keep this information confidential. Materials that contain confidential information, such as memos, notebooks, mobile devices, thumb drives or other data storage devices, and laptop computers, should be stored securely. Unauthorized posting or discussion of any information concerning our business, information, or prospects on the Internet is prohibited. Except as otherwise authorized by the Compliance Officer, you may not discuss our business, information, or prospects in any "chat room," regardless of whether you use your own name or a pseudonym. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants, and "quasi-public" areas within the Company, such as cafeterias. All of the Company's emails, voicemails, and other communications are presumed confidential and should not be forwarded outside of the Company, except where required for legitimate business purposes. Additionally, you must take appropriate precautions to ensure that confidential or sensitive business information is communicated within the Company only to those employees who have a need to know such information to perform their work responsibilities, whether it is proprietary to us or another party for whom we have agreed to maintain confidentiality. The Company's employees are bound by the terms of the Employee Confidentiality and Nondisclosure Agreement or similar terms that they agree to in connection with their employment.

In addition to the above responsibilities, if you are handling information protected by any privacy policy published by us, such as our privacy policy at https://www.sweetgreen.com/privacy-policy, you should be aware of how to handle such information in accordance with that applicable policy.

Nothing contained in this Code or the Company's Whistleblower Policy limits or otherwise prohibits any individual (including any current or former employee) from discussing or disclosing information about unlawful acts in the workplace, such as harassment, discrimination, retaliation, or any other conduct that you have reason to believe is unlawful, or communicating with, filing a charge or complaint with, or otherwise participating in any investigation or proceeding with any U.S. federal, state, or local governmental or law enforcement branch, agency, entity, or commission, including providing documents or other information, without notice to the Company, provided that (i) in each case such communications and disclosures are consistent with applicable law and (ii) the information subject to such disclosure was not obtained by the current or former employee through a communication that was subject to the attorney client privilege, unless such disclosure of that information would otherwise be permitted by an attorney pursuant to 17 CFR 205.3(d)(2), applicable state attorney conduct rules, or otherwise. Any agreement (including without limitation any confidentiality agreement, nondisclosure agreement, employment agreement, separation agreement, or similar employment or compensation arrangement) in conflict with the foregoing is hereby deemed amended by the Company to be consistent with the foregoing.

14. Media/Public Discussions

It is our policy to disclose material information concerning the Company to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the Company will have equal access to information. All inquiries or calls from the press should be referred to the communications department at press@sweetgreen.com and all inquiries or calls from investors and financial analysts should be referred to the investor relations department at ir@sweetgreen.com.

Please also refer to the Company's Corporate Disclosure Policy.

15. Waivers

The Compliance Officer is responsible for interpreting and applying the Code in situations in which questions may arise. The Compliance Officer may grant exceptions to, or waivers of compliance with, certain provisions of the Code in appropriate circumstances for non-executive personnel. Any member of our personnel who believes that a situation may warrant such an exception or waiver should contact the Compliance Officer.

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer, or controller (or persons performing similar functions)) or directors may be authorized only by our Board or, to the extent permitted by the NYSE rules and our Corporate Governance Guidelines, a committee of the Board, and will be disclosed to stockholders as required by applicable laws, rules, and regulations.

16. Questions and Reporting Potential Violations

Your most immediate resource for any matter related to this Code is your supervisor, who may have the information you need or may be able to refer the question to another appropriate source. There may, however, be times when you prefer not to go to your supervisor. In these instances, you should feel free to discuss your concern with the Compliance Officer. We have designated our Chief Legal Officer, or if the Chief Legal Officer is unavailable or if no individual currently holds such position, then our Vice President, Deputy General Counsel, to the position of Compliance Officer to oversee this program. The Compliance Officer may be reached at compliance@sweetgreen.com.

In addition to fielding questions or concerns with respect to potential violations of this Code, the Compliance Officer is responsible for:

- investigating possible violations of this Code;
- training new employees in Code policies;
- conducting periodic training sessions to refresh employees' familiarity with this Code;
- periodically distributing copies of this Code to each employee with a reminder that each employee is responsible for reading, understanding, and complying with this Code;
- updating this Code as needed and alerting employees to any updates, with appropriate approval of the Audit Committee, to reflect changes in the law, the Company's operations, and recognized best practices, and to reflect the Company's experience; and
- otherwise promoting an atmosphere of responsible and ethical conduct.

If you are aware of a suspected or actual violation of this Code, you have a responsibility to promptly report it, and we will take prompt disciplinary action against any employee, officer, or director who retaliates against you. The Compliance Officer will investigate all reported possible code violations promptly and with the highest degree of confidentiality that is reasonably possible under the specific circumstances.

Supervisors must promptly report any complaints or observations of Code violations to the Compliance Officer. If you believe your supervisor has not taken appropriate action, you should contact the Compliance Officer directly. Neither you nor your supervisor may conduct any preliminary investigation, unless authorized to do so by the Compliance Officer. The Compliance Officer will consult with others in the Legal Department, the People department, and/or the Audit Committee, as needed. It is our policy to employ a fair process by which to determine violations of this Code.

You can also submit a report on AllVoices, which is the Company's anonymous reporting and feedback hotline, by submitting a report through the AllVoices application in your Sweetgreen Apps Dashboard, by navigating to https://sweetgreen.allvoices.co/ on your web browser, or by calling 866-388-1915 (toll free), including concerns regarding the Company's auditing and accounting matters in accordance with theCompany's Whistleblower Policy. You may call the toll-free number anonymously if you prefer, as it is not equipped with caller identification, although in that case the Compliance Officer will be unable to obtain follow-up details from you that may be necessary to investigate the matter. Whether you identify yourself or remain anonymous, your contact with the anonymous reporting service will be kept strictly confidential to the extent reasonably possible within the objectives of this Code.

If any investigation indicates that a violation of this Code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee, officer, or director is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including, termination and, in appropriate cases, civil action or referral for criminal prosecution.

17. Changes; Periodic Review

Any changes to this Code may be made by the Audit Committee and will be recommended to the Board for approval and effective upon approval by the Board. The Audit Committee will review and reassess the adequacy of this Code periodically, and recommend to the Board any changes the Audit Committee determines are appropriate. All changes must be promptly disclosed as required by law or regulation.

18. Website Disclosure

This Code, as may be amended from time to time, shall be posted on the Company's website. The Company shall state in its annual proxy statement that this Code is available on the Company's website and provide the website address as required by law or regulation.

Last Amended: September 1, 2026

Exhibit A

Acknowledgement of Code of Business Conduct and Ethics

By electronically signing below, I acknowledge that I have reviewed the Code of Business Conduct and Ethics and agree to comply. I understand that the Code of Business Conduct and Ethics will be accessible for my review at any time through the SG Support application in your Sweetgreen Apps Dashboard.

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Signature

____

Name

____

Date