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NOVEMBER 3, 2020

VIA E-MAIL (shareholderproposals@sec.gov)

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, DC 20549

Re: Stockholder Proposal Submitted by National Center for Public Policy Research

Ladies and Gentlemen:

We are writing on behalf of our client, Starbucks Corporation, a Washington corporation (the "Company"), pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), to notify the staff of the Division of Corporation Finance (the "Staff") of the Securities and Exchange Commission (the "Commission") of the Company's intention to exclude the shareholder proposal (the "Proposal") and supporting statement (the "Supporting Statement") submitted by the National Center for Public Policy Research (the "Proponent"), by a letter dated September 17, 2020, from the Company's proxy statement for its 2021 annual meeting of shareholders (the "Proxy Statement").

In accordance with Section C of SEC Staff Legal Bulletin No. 14D (Nov. 7, 2008) ("SLB 14D"), we are emailing this letter and its attachments to the Staff at shareholderproposals@sec.gov. In accordance with Rule 14a-8(j), we are simultaneously sending a copy of this letter and its attachments to the Proponent as notice of the Company's intent to omit the Proposal from the Proxy Statement. The Company expects to file its definitive Proxy Statement with the Commission on or about January 22, 2021, and this letter is being filed with the Commission no later than 80 calendar days before that date in accordance with Rule 14a-8(j).

Rule 14a-8(k) and Section E of SLB 14D provide that shareholder proponents are required to send companies a copy of any correspondence that the shareholder proponent elects to submit to the Commission or the Staff. Accordingly, we are taking this opportunity to remind the Proponent that if the Proponent submits correspondence to the Commission or the Staff with respect to the Proposal, a copy of that correspondence should concurrently be furnished to the undersigned on behalf of the Company.

THE PROPOSAL

The Proposal and Supporting Statement are attached hereto as Exhibit A. The Proposal and Supporting Statement read as follows:

Charitable Giving Reporting

Be it RESOLVED that shareholders of the Starbucks Corporation (“Company”) request that the Company prepare and annually update a report to shareholders, at reasonable expense and excluding proprietary information, listing and analyzing charitable contributions made or committed during the prior year. The report should:

1. Identify organizational or individual recipients of donations, whether cash or in-kind, in excess of \$500, and aggregate smaller contributions by categories of recipients such as community organizations, schools, medical groups, churches, political or social activism organizations, and the like;
2. Identify for donations not yet spent or used: the purposes to which the donations are to be put, any restrictions on the use of the donations, and any mechanisms by which the restrictions on donations will be monitored and enforced;
3. Identify for donations already spent or used: the purposes to which the donations were to be put, the purposes to which the donations were actually put, the method by which the use of the donations was monitored and ascertained, and an evaluation of the efficacy of the donation and the Company’s intention with regard to future donations to the organization;
4. Include management’s analysis of any risks to the Company’s brand, reputation, or shareholder value posed by all public controversies associated with the donations, including an explanation of the objective and consistent standards by which such controversies were discovered and their effect on the Company gauged; and
5. Identify, if and as appropriate, philanthropic areas or initiatives considered most germane to corporate values while posing less risk to Company reputation; or in the alternative, any decision to scale back without replacement risky or misused donations.

Supporting Statement

The SEC has long and consistently stated that charitable contributions by corporations are “generally found to involve a matter of corporate policy which is extraordinary in nature and beyond a company’s ordinary business operations,”¹ and so are amenable, without omission, to shareholder proposals that require reporting about them and about potential or realized risks and controversies arising from them, so long as the proposal relates, as this one does, to the corporation’s “charitable contributions generally,” rather than merely to some segment of the corporation’s contributions.²

The need for reporting has grown acute in this shareholder season. Many contributions seem unlikely to raise material concerns.³ In recent months, however, the Company has made significant charitable commitments in response to political and social events, commitments that are highly divisive,⁴ not apparently successful in quelling rioter hate,⁵ and carry with them significant potential for misapplication to activities very risky to the Company’s reputation. The Company’s commitment to potentially problematic contributions remains vague: it has, for example, pledged \$1 million in contributions to unspecified organizations to promote “equity,” an opaque term often suggesting radical and divisive commitments, in unspecified ways.⁶ It is therefore vital that the Company monitor carefully, and report to shareholders, the content of, intentions for, actual use of and lessons learned from its charitable contributions.

¹ <https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2010/humanlife021910-14a8.pdf>

² <https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2017/johnharrington022817-14a8.pdf>

³ <https://www.starbucks.com/responsibility/community/starbucks-foundation>

⁴ <https://www.breitbart.com/politics/2020/06/02/silent-majority-poll-shows-american-voters-support-use-of-military-national-guard-in-riots/>

⁵ <https://thepostmillennial.com/amazon-and-starbucks-give-millions-to-blm-still-get-looted-and-destroyed/>;
<https://thepostmillennial.com/antifa-rioters-made-lists-of-seattle-businesses-to-destroy>

⁶ <https://stories.starbucks.com/stories/2020/starbucks-shares-update-on-standing-together-against-racial-injustice/>;
<https://thepostmillennial.com/antifa-rioters-made-lists-of-seattle-businesses-to-destroy>

BASIS FOR EXCLUSION

In accordance with Rule 14a-8, we hereby respectfully request that the Staff confirm that no enforcement action will be recommended against the Company if the Proposal and the Supporting Statement are omitted from the Proxy Statement for the following reason:

- The Proposal may be omitted pursuant to Rule 14a-8(i)(7) because it deals with a matter relating to the Company's ordinary business operations.

ANALYSIS

Rule 14a-8(i)(7) provides that a shareholder proposal may be omitted from a proxy statement “[i]f the proposal deals with a matter relating to the company’s *ordinary business operations*” (emphasis added). When adopting amendments to Rule 14a-8 in 1998, the Commission explained that the policy underlying the ordinary business exclusion is “to confine the resolution of ordinary business problems to management and the board of directors, since it is impracticable for shareholders to decide how to solve such problems at an annual shareholders meeting.” See, Release No. 34-40018 (May 21, 1998) (the “1998 Release”).

The 1998 Release described the two “central considerations” for the ordinary business exclusion. The first consideration is that certain tasks are “so fundamental to management’s ability to run a company on a day-to-day basis” that they could not, as a practical matter, be subject to direct stockholder oversight. In this respect, the Staff has consistently recognized that proposals relating to charitable contributions to specific types of organizations may be excluded under Rule 14a-8(i)(7) as a component of a company’s “ordinary business.” The second consideration “relates to the degree to which the proposal seeks to ‘micro-manage’ the company by probing too deeply into matters of a complex nature upon which stockholders, as a group, would not be in a position to make an informed judgment.” The Staff indicates that this second consideration “may come into play in a number of circumstances, such as where the proposal involves intricate detail, or seeks to impose specific time-frames or methods for implementing complex policies.” The Staff has recently elaborated on this by explaining that “a proposal that seeks an intricately detailed study or report may be excluded on micromanagement grounds.” See Staff Legal Bulletin No. 14J (Oct. 23, 2018) (“SLB 14J”). SLB 14J also emphasizes that a proposal that may not be excludable on the basis of its subject matter may nevertheless be excludable on the basis of micromanagement.

In light of the above, the Company believes that the Proposal may be excluded as it (1) seeks to micromanage the Company because it (a) probes too deeply into complex matters that are more appropriate for management’s, and not shareholders’, consideration and (b) requests an intricately detailed report and (2) relates to charitable contributions to specific types of organizations.

I. The Proposal seeks to micromanage the Company because it probes too deeply into matters of a complex nature upon which shareholders are not in a position to make an informed judgment, and therefore may be omitted under Rule 14a-8(i)(7).

The Staff has consistently held that proposals that aim to micromanage a company's management regarding its day-to-day decisions are excludable under Rule 14a-8(i)(7) as relating to a company's "ordinary business." See, SLB 14J. The Proposal seeks to micromanage the Company's management by, as noted in SLB 14J and in the 1998 Release, "probing too deeply into matters of a complex nature upon which stockholders, as a group, would not be in a position to make an informed judgment." The Company therefore believes that the Proposal may be excluded in reliance on Rule 14a-8(i)(7).

The Proposal, in relevant part, includes language requesting that the Company prepare and annually update a report to its shareholders "listing and analyzing charitable contributions made or committed during the prior year." Such report, as contemplated by the Proposal, would "identify organizational or individual recipients of donations ... in excess of \$500," as well as "identify ... the purposes to which ... donations are to be put." The Proposal also calls for the report to "[i]nclude management's analysis of any risks to the Company's brand, reputation or shareholder value posed by all public controversies associated with the donations, including an explanation of the objective and consistent standards by which such controversies were discovered and their effect on the Company gauged" When it comes to proposals requesting reports, the Staff makes its evaluation by considering the "underlying subject matter" of the proposal when applying Rule 14-8(i)(7). See, Release No. 34-20091 (Aug. 16, 1983) (the "1983 Release"). Therefore, the relevant question is whether determining the nonprofit organizations to which the Company directs its charitable contributions is an element of the Company's ordinary business.

As stated in its most recent proxy statement and reiterated in numerous communications to its shareholders and other stakeholders, for the Company, the pursuit of profit is consistent with the pursuit of doing good and that commitment to doing good is, in part, implemented through its Global Social Impact Strategy.⁷ As part of its broader Global Social Impact Strategy (as seen in the 2019 Global Social Impact Report (see Exhibit B)), the Company contributes to a wide range of nonprofit organizations in communities around the world on a regular basis.⁸ The Company's charitable giving includes cash donations, in-kind support and volunteer hours to aid hunger relief, provide resources to unsheltered families, fund disaster relief and rebuilding, provide care packages and coffee to US troops, first responders and frontline healthcare workers, and expand access to resources to support the mental health of veterans and first responders. Some of the Company's charitable contributions go to The Starbucks Foundation, a 501(c)(3) charitable organization that receives the majority of its funding from the Company. The Starbucks Foundation, through a rigorous grant-making process and oversight by its board of directors (which includes members of the Company's management team), focuses on strengthening humanity by transforming lives across the world, with a focus on

⁷ See, Starbucks Corporation, 2020 Notice of Annual Meeting of Shareholders and Proxy Statement, at page 15, available at <https://sec.report/Document/0001206774-20-000230/sbux3632601-def14a.htm>.

⁸ See, <https://www.starbucks.com/responsibility>.

enabling community resiliency and prosperity and uplifting communities affected by disaster. Global efforts include empowering women and girls, expanding education and access to clean water (for instance, through its management of the Ethos Water Fund, which was created by the Company to help finance clean water programs around the world)⁹ and, most recently, responding to the worldwide COVID-19 pandemic.¹⁰ Given the Company's focus on pursuing profits while pursuing good, the Company's management must and does thoughtfully and actively consider how to distribute its charitable contributions to best support various causes and initiatives around the world, including when contributions are made to The Starbucks Foundation.

The Company notes that the Proposal is strikingly similar to a proposal submitted by the same Proponent to JPMorgan Chase & Co. ("JPM") for inclusion in its 2018 proxy materials (the "JPM Proposal"). In the JPM Proposal, the Proponent sought to "impose upon the [c]ompany's charitable contribution decisions the Proponent's opinion on which nonprofit organizations are suitable to receive aid from the [c]ompany, which would significantly impact the day-to-day decision making of the [c]ompany regarding how it chooses nonprofit organizations to which it will provide charitable contributions," specifically aiming to exclude charitable contributions to the Southern Poverty Law Center, Planned Parenthood and the Clinton Foundation. The JPM Proposal further noted that decisions surrounding the nonprofit organizations to which JPM directs its charitable contributions "[require] deep knowledge of the [c]ompany's business and operations – information to which the [c]ompany's shareholders do not have access" and that "numerous factors, including the objectives of a particular nonprofit organization, the expected use of the charitable contribution to best assist community development [and] legal and regulatory considerations and competitive factors" must be taken into consideration for charitable contribution determinations. As you are aware, on February 28, 2018, the Staff determined that it would not recommend enforcement action to the Commission if JPM omitted the proposal from its proxy materials in reliance on Rule 14a-8(i)(7).

As in the JPM Proposal, the Proponent here seeks to impose upon the Company its opinion as to which nonprofit organizations are and are not suitable to receive aid from the Company—and is primarily opposed to the Company donating to organizations that support the Black Lives Matter movement ("BLM"), as discussed more extensively in Section III below. As discussed above, the Company's decision making and processes surrounding its charitable contributions involve analyzing complicated factors, such as the objectives of partner nonprofit organizations, the expected use of the charitable contribution, legal and regulatory considerations and market and competitive factors, among others. Collectively, the Company's shareholders are not well-positioned to make determinations, through the proxy process, on the Company's charitable contribution decision making, which involves an analysis of the preceding complicated factors. The Company believes that the Proposal concerns a complex issue best suited for the Company's management and therefore may be excluded in Reliance on Rule 14a-8(i)(7).

⁹ See, <https://stories.starbucks.com/stories/the-starbucks-foundation/>.

¹⁰ <https://stories.starbucks.com/press/2020/the-starbucks-foundation-supporting-community-response-and-resilience-during-covid-19/>

II. The Proposal seeks to micromanage the Company because it would require an intricately detailed report, and therefore may be omitted under Rule 14a-8(i)(7).

Another way in which a proposal can seek to micromanage a company's management is by requiring, as noted in SLB 14J, "an intricately detailed study or report." The level of detail required by the report to shareholders contemplated by the Proposal rises to the level of micromanagement. As such the Company therefore believes that the Proposal may be excluded in reliance on Rule 14a-8(i)(7).

The report envisioned by the Proposal would require that the Company identify both cash and in-kind donations in excess of \$500 and "aggregate smaller contributions by categories of recipients." Further, among other burdensome requirements, the Company would have to determine to what purposes donations were both intended to be put and actually put; evaluate the "efficacy of the donation"; and include an analysis of "*any* risks to the Company's brand reputation, or shareholder value posed by *all* public controversies" (emphasis added). The Staff has in the past concurred that proposals seeking reports with high levels of requested detail may be omitted in reliance on Rule 14a-8(i)(7). See, PayPal Holdings, Inc. (avail. Mar. 6, 2018) (concurring in the omission of a proposal requesting that the company prepare a report "with a specific goal ... by a specific deadline, and [that] requires the development and evaluation of a plan in order to assess the feasibility of achieving that goal"); Ford Motor Co. (avail. Mar. 2, 2004) (concurring in the omission of a proposal seeking to dictate "the specific method of preparation and the specific information to be included in a highly detailed report"); and Schering-Plough Corp. (avail. Mar. 4, 2002) (concurring in the omission of a proposal requesting that the company "study the impact charitable contributions have on the business of the company and its share value ... [and] publish a report to be made available to all shareholders"). Compiling a report of the type requested by the Proposal would be highly impracticable and any effort by the Company to prepare the contemplated report would require a substantial investment of time and resources and would distract the Company's management and employees ("partners") from the Company's stated goal of pursuing profit and doing good.

Adding to the complexity involved in the proposed report is the fact that the Company, like many businesses, offers a matching program for charitable donations made by its partners to charitable organizations (including matching service hours with monetary donations). Under the program, each partner's aggregate match for eligible donations is capped at \$1,500. In addition, the aggregate amount of matching donations made by the Company is subject to a cap. Donations made by the Company under this matching program are included within its overall charitable donations and would be captured in the report requested by the Proposal. While the Company has controls in place to ensure that matching donations are going to legitimate charities, it has not historically required partners to provide the purpose of their donations, analyze the efficacy of those donations, or monitor the use of the donations, all of which would seem to be required by the Proposal. The Company is concerned that gathering such additional information from partners participating in the matching program will be administratively infeasible, will have a chilling effect on the willingness of partners to participate in the matching program and will negatively impact partner morale.

For the above reasons, it is the Company's view that the Proposal may be omitted pursuant to Rule 14a-8(i)(7) on the basis that having to publish an intricately detailed report would micromanage the Company.

III. The Proposal relates to charitable contributions to a specific type of organization, and therefore may be omitted under Rule 14a-8(i)(7).

The Company maintains that the Proposal may be omitted in reliance on Rule 14a-8(i)(7) because the Staff has consistently recognized that proposals relating to charitable contributions to specific types of organizations may be excluded under Rule 14a-8(i)(7) as a component of a company's "ordinary business." The Proposal, read together with the Supporting Statement and the Supporting Statement's footnotes, does not have a general objective. Instead, it clearly seeks to prevent the Company from contributing to organizations that support a particular movement to which the Proponent is opposed: BLM. As noted above, when it comes to proposals requesting reports, the Staff makes its evaluation by considering the "underlying subject matter" of the proposal, regardless of how the proposal is framed, when applying Rule 14-8(i)(7). See, the 1983 Release; Staff Legal Bulletin No. 14H (Oct. 22, 2015). Here, the "underlying subject matter" is revealed by the Supporting Statement, which in part states "[i]n recent months ... the Company has made significant charitable commitments in response to political and social events, commitments that are highly divisive, not apparently successful in quelling rioter hate, and carry with them significant potential for misapplication to activities very risky to the Company's reputation" (footnotes omitted). Other than citing to two no-action requests previously submitted to and considered by the Commission, the footnotes in the Supporting Statement all lead to webpages with articles or releases describing recent protests in connection with BLM, the damage done to certain of the Company's physical locations in such protests and the Company's charitable contributions to "promote racial equity and create more inclusive and just communities." The Proposal, when read in conjunction with the accompanying Supporting Statement and its footnotes and as discussed further below in this Section III, plainly seeks to limit the Company's charitable contributions only with respect to BLM, a movement that is not supported by the Proponent. Accordingly, the subject matter of the report requested by the Proposal relates directly to an ordinary business matter, namely that of the Company deciding the nonprofit organizations to which it should or should not make charitable contributions.

The Staff has in the past concurred that proposals seeking to require a company to make or, as in the Proposal, prohibit a company from making, contributions to specific organizations or specific types of organizations relate to a company's ordinary business operations and therefore may be omitted under Rule 14a-8(i)(7). See, JPMorgan Chase & Co. (avail. Feb. 28, 2018) (concurring in the omission of a proposal requesting the company provide an annual report disclosing the company's standards for choosing recipients of charitable donations); PG&E Corp. (avail. Feb. 4, 2015) (concurring in the omission of a proposal requesting the company limit its contributions that support same-sex marriage); The Walt Disney Co. (avail. Nov. 20, 2014) (concurring in the omission of a proposal relating to charitable contributions to the Boy Scouts of America); PepsiCo, Inc. (avail. Feb. 24, 2010) (concurring in the omission of a proposal relating to financial support of organizations that either reject or support homosexuality); Wachovia Corp. (avail. Jan. 25, 2005) (concurring in the omission of a proposal recommending that the board prohibit charitable contributions to

Planned Parenthood and other organizations that provide abortion services); Bank of America Corp. (avail. Jan. 24, 2003) (concurring in the omission of a proposal seeking to prohibit charitable contributions to Planned Parenthood and organizations that support abortion); and American Home Products Corp. (avail. Mar. 4, 2002) (concurring in the omission of a proposal requesting that the company form a committee to study the impact of its charitable contributions in the context of specific prior charitable contributions to Planned Parenthood).

The Staff has historically looked at all of the facts, circumstances and evidence surrounding a shareholder proposal, including supporting statements, to determine whether a proposal is actually directed toward contributions to specific charitable organizations or specific types of charitable organizations. In fact, a significant body of precedent no-action requests and Staff responses recognizes that, even if the language of a resolution does not specifically mention certain organizations or causes, a proposal may still be omitted under Rule 14a-8(i)(7) where the supporting statement, (as the Supporting Statement and its footnotes do here) indicates that the proposal would act as a shareholder vote on corporate contributions to a particular charitable organization or type of charitable organization. See, JPMorgan Chase & Co. (avail. Feb. 28, 2018) (supporting statement referenced specific contributions to the Southern Poverty Law Center, Planned Parenthood and the Clinton Foundation); Starbucks Corp. (avail. Jan. 4, 2018) (supporting statement referenced specific contributions to Planned Parenthood, the Human Rights Campaign and the Southern Poverty Law Center); The Home Depot, Inc. (avail. Mar. 18, 2011) (supporting statement referenced specific contributions to organizations and groups that support the LGBT community); Johnson & Johnson (avail. Feb. 12, 2007) (supporting statement referenced specific contributions to Planned Parenthood); Wells Fargo & Co. (avail. Feb. 12, 2007) (the “whereas” clauses of the proposal specifically criticized Planned Parenthood and a lack of contributions to the Boy Scouts of America); Bank of America Corp. (avail. Jan. 24, 2003) (supporting statement referenced specific contributions to Planned Parenthood); American Home Products Corp. (avail. Mar. 4, 2002) (“whereas” clauses of the proposal specifically referenced contributions to Planned Parenthood); and Schering-Plough Corp. (avail. Mar. 4, 2002) (a “whereas” clause of the proposal and the supporting statement referenced specific contributions to Planned Parenthood).

In the JPM Proposal discussed above, the same Proponent included language concerning JPM’s general charitable contributions, but the supporting statement focused on specific charitable contributions to three organizations. Similarly, the proponent of the above-referenced Starbucks proposal submitted to the Company for inclusion in its 2018 proxy materials (the “Starbucks 2018 Proposal”), much like the Proponent here, made thinly-veiled attempts to offer a facially neutral proposal, despite the fact that the proposal was aimed at limiting specific types of charitable contributions. Amongst other examples, the supporting statement of the Starbucks 2018 Proposal criticized Planned Parenthood, a recipient of the Company’s charitable contributions, for “being the subject of much controversy.” The Staff, on January 4, 2018, concurred that the Starbucks 2018 Proposal could be omitted from the Company’s proxy materials in reliance on Rule 14a-8(i)(7) as the proposal “relate[d] to contributions to specific types of organizations.” As demonstrated in the JPM Proposal, the Starbucks 2018 Proposal and the other proposals referenced above, the Staff considers more than just the facial neutrality of a proposal, and looks to the full context, including the supporting statement, in determining a proposal’s goals and objectives.

When read together with the Supporting Statement and the Supporting Statement’s footnotes, the Proposal is an attempt to conduct a shareholder referendum opposing the Company’s charitable contributions in support of a specific cause to which the Proponent is opposed—BLM. The Proponent has published various articles that demonstrate its opposition to BLM, including those titled “How Woke CEOs Traded Our Future for BLM Approval,”¹¹ “Mastercard Unable to Defend its Support for Marxist Group ‘Black Lives Matter,’”¹² “Civil Rights Movement Had a ‘Moral Authority’ Black Lives Matter Lacks,”¹³ “2020’s ‘Moral Panic’ Put Corporate Reputations at Risk”¹⁴ and “Black Lives Matter Movement Is no Longer Redeemable, Says Project 21’s Nedd,”¹⁵ along with a petition against Amazon titled “Tell Amazon to Stop Funding Black Lives Matter.”¹⁶ As in the precedent proposals referenced above, the Staff should consider more than the language on the face of the Proposal’s resolved clause, including the following statements from the Supporting Statement and the substance of the sources linked in the footnotes thereto, in determining the Proposal’s true objective:

- “In recent months, however, the Company has made significant charitable commitments in response to political and social events, commitments that are highly divisive, not apparently successful in quelling rioter hate, and carry with them significant potential for misapplication to activities very risky to the Company’s reputation” (footnotes citing to articles describing BLM protests and the Company’s charitable contributions in support of BLM omitted).
- “The Company’s commitment to potentially problematic contributions remains vague: it has, for example, pledged \$1 million in contributions to unspecified organizations to promote ‘equity,’ an opaque term often suggesting radical and divisive commitments, in unspecified ways” (footnote citing to a release describing the Company’s charitable contributions in support of BLM and an article describing BLM protests omitted).

The Company recognizes that the no-action request precedents cited above include in the text of their supporting statements the particular charitable organization to which the respective proponents oppose the company donating. The Supporting Statement at issue does not specifically mention BLM in the body of the text. However, the footnotes to the Supporting Statement make it clear that the Proponent is engaged in an attempt to conduct a shareholder referendum specifically opposing the Company’s charitable contributions in support of BLM. Although the Proponent has shifted the placement of its references to BLM to the footnotes of the Supporting Statement, it is still clear that the Proponent is singling out

¹¹ See, <https://nationalcenter.org/ncppr/2020/09/18/how-woke-ceos-traded-our-future-for-blm-approval/>.

¹² See, <https://nationalcenter.org/ncppr/2020/06/16/mastercard-unable-to-defend-its-support-for-marxist-group-black-lives-matter/>.

¹³ See, <https://nationalcenter.org/project21/2020/08/12/civil-rights-movement-had-a-moral-authority-black-lives-matter-lacks/>.

¹⁴ See, <https://nationalcenter.org/ncppr/2020/10/06/2020s-moral-panic-put-corporate-reputations-at-risk/>.

¹⁵ See, <https://nationalcenter.org/project21/2015/11/06/black-lives-matter-movement-is-no-longer-redeemable-says-project-21s-nedd/>.

¹⁶ See, <https://nationalcenter.org/tell-amazon-to-stop-funding-black-lives-matter/>.

the Company's charitable contributions in support of just this one cause. The text of the Supporting Statement itself may not contain certain strongly-worded remarks or apparent statements in opposition to BLM, but the first article in the fourth footnote of the Supporting Statement, for example, refers to members of BLM as a "lawless faction of rioters."¹⁷ The Supporting Statement also criticizes a pledge of \$1 million in contributions by the Company "to unspecified organizations to promote 'equity,'" and the footnote thereto links to an article published by the Company on its website titled "Black Lives Matter: Starbucks update on standing against racial injustice."¹⁸ The article in question, along with discussing BLM at length, mentions not only the word "equity," as selected by the Proponent in the Supporting Statement, but also the word "racial"; the full context is that "[T]he Starbucks Foundation is committing \$1 million in Neighborhood Grants to promote *racial equity* and create more inclusive and just communities"¹⁹ (emphasis added). As illustrated, the body text of the Proposal and Supporting Statement carefully omitted direct references to BLM or racial issues, but the substance of the articles linked to by the Supporting Statement's footnotes reveal that the Proponent is opposed to charitable contributions in support of one specific type of organization. Accordingly, when the Proposal, the Supporting Statement and the footnotes to the Supporting Statement are considered as a whole, it is clear that the Proponent is specifying charitable contributions in support of one type of organization to which the Proponent is opposed, and the focus of the Proposal is thus an ordinary business matter.

The Company also recognizes that the Staff has previously denied certain no-action requests for shareholder proposals containing facially neutral resolutions relating to charitable donations in which the companies maintained that such proposals were truly directed to specific causes or organizations. See, McDonald's Corp. (avail. Feb. 28, 2017) (Staff unable to concur with the exclusion of a proposal requesting a report listing charitable contributions and their consistency with the company's stated commitments); Wells Fargo & Co. (avail. Feb. 19, 2010) (Staff unable to concur with the exclusion of a proposal requesting the company list the recipients of charitable contributions on its website); PepsiCo, Inc. (avail. Mar 2, 2009) (Staff unable to concur with the exclusion of a proposal requesting a report on the company's charitable contributions and related information); and Ford Motor Co. (avail. Feb. 25, 2008) (Staff unable to concur with the exclusion of a proposal requesting the company list the recipients of charitable contributions on its website).

We believe that the Proposal is distinguishable from the proposals referenced in the above paragraph in that the Proposal more strongly and plainly contains a negative characterization of one specific movement, BLM. The other proposals were more neutral or contained only brief or isolated references to specific charitable organizations or causes. The Supporting Statement specifically cites the Staff's response to two of the above proposals that were denied no-action relief—the proposal submitted to Wells Fargo & Co. for inclusion in its 2010 proxy materials (the "Wells Fargo 2010 Proposal") and the proposal submitted to McDonald's Corporation for inclusion in its 2017 proxy materials (the "McDonald's Proposal"). The Proposal is distinguishable from the Wells Fargo 2010 Proposal and the

¹⁷ See, <https://thepostmillennial.com/amazon-and-starbucks-give-millions-to-blm-still-get-looted-and-destroyed/>.

¹⁸ See, <https://stories.starbucks.com/stories/2020/starbucks-shares-update-on-standing-together-against-racial-injustice/>.

¹⁹ *Id.*

McDonalds Proposal in that the Supporting Statement and its footnotes are very pointedly negative about one specific cause, BLM, for no apparent reason other than the Proponent being opposed to such cause. The Supporting Statement notes, for example, that “the Company has made significant charitable commitments that are highly divisive, not apparently successful in quelling rioter hate, and carry with them significant potential misapplication to activities very risky to the Company’s reputation” (footnotes citing to articles describing BLM protests and the Company’s charitable contributions in support of BLM omitted). The Supporting Statement also notes that the Company “pledged \$1 million in contributions to unspecified organizations to promote ‘equity,’ an opaque term often suggesting radical and divisive commitments, in unspecified ways” (footnote citing to a release describing the Company’s charitable contributions in support of BLM and an article describing BLM protests omitted). These words alone indicate the Proponent’s disapproval of the Company’s specific charitable contributions, but the articles to which the footnotes in the Supporting Statement link and the websites on which they are hosted—Breitbart News Network, a far-right news website, and *The Post Millennial*, a right-leaning Canadian online news magazine with purported ties to the Conservative Party of Canada²⁰—reveal the Proponent’s actual beliefs. Stephen Bannon, former chairman of Breitbart News Network, proclaimed in 2016 that the website was “the platform for the alt-right,”²¹ and *The Post Millennial* has been characterized as “‘strongly biased’ toward the right.”²² The Wells Fargo 2010 Proposal, in contrast, included generic statements such as “[w]hether one approves or disapproves of abortion, most would acknowledge that it is a controversial issue” and “[w]hile same sex marriage has its supporters, who could voice their support for the [c]ompany’s funding decision, it also has its detractors.” The McDonald’s Proposal, meanwhile, is not negative about or opposed to the specific charitable causes in question—health organizations and school fundraisers—but rather focuses on opposition to McDonald’s charitable donations by teachers’ unions and health advocacy groups due to the incongruity between the nature of McDonald’s business and the organizations to which they donated. Unlike in the McDonald’s Proposal, the Proposal here goes beyond providing illustrative examples of concern and instead aims to dictate the types of donations that the Proponent thinks the Company should not be making.

We therefore believe that, despite being facially neutral, when read together with the Supporting Statement and its footnotes, it is clear the Proposal seeks to limit charitable contributions in support of one specific movement, BLM, and thus deals with a matter relating to the Company’s ordinary business and is excludable under Rule 14a-8(i)(7).

* * * * *

²⁰ See, <https://www.cbc.ca/news/politics/the-post-millennial-journalism-conservative-advocacy-1.5191593/>.

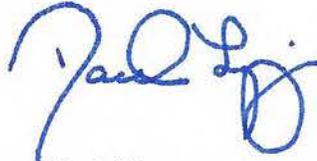
²¹ See, <https://www.motherjones.com/politics/2016/08/stephen-bannon-donald-trump-alt-right-breitbart-news/>.

²² See, <https://www.nationalobserver.com/2019/08/22/news/he-used-work-site-promoted-racists-now-he-edits-canadian-news-outlet/>.

Conclusion

By copy of this letter, the Proponent is being notified that for the reasons set forth herein the Company intends to omit the Proposal and Supporting Statement from its Proxy Statement. We respectfully request that the Staff confirm that it will not recommend any enforcement action if the Company omits the Proposal and Supporting Statement from its Proxy Statement. If we can be of assistance in this matter, please do not hesitate to call me.

Sincerely,



David Lopez

Enclosures

cc: Justin Danhof, Esq., National Center for Public Policy Research
Rachel Gonzalez, Starbucks Corporation
Jennifer Kraft, Starbucks Corporation

EXHIBIT A

E-MAILED
9-22-20
K.R.

RECEIVED
SEP 22 2020
Initial: S-h



September 17, 2020

Via FedEx to

Rachel A. Gonzalez, Corporate Secretary
Starbucks Corporation
2401 Utah Avenue South
Mail Stop S-LA1
Seattle, Washington 98134

Dear Ms. Gonzalez,

I hereby submit the enclosed shareholder proposal ("Proposal") for inclusion in the Starbucks Corporation (the "Company") proxy statement to be circulated to Company shareholders in conjunction with the next annual meeting of shareholders. The Proposal is submitted under Rule 14(a)-8 (Proposals of Security Holders) of the United States Securities and Exchange Commission's proxy regulations.

I submit the Proposal as the Deputy Director of the Free Enterprise Project of the National Center for Public Policy Research, which has continuously owned Company stock with a value exceeding \$2,000 for a year prior to and including the date of this Proposal and which intends to hold these shares through the date of the Company's 2021 annual meeting of shareholders. A Proof of Ownership letter is forthcoming and will be delivered to the Company.

Copies of correspondence or a request for a "no-action" letter should be forwarded to Justin Danhof, Esq, General Counsel, National Center for Public Policy Research, 20 F Street, NW, Suite 700, Washington, DC 20001 and emailed to JDanhof@nationalcenter.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Shepard".

Scott Shepard

Enclosure: Shareholder Proposal

Charitable Giving Reporting

Be it RESOLVED that shareholders of the Starbucks Corporation (“Company”) request that the Company prepare and annually update a report to shareholders, at reasonable expense and excluding proprietary information, listing and analyzing charitable contributions made or committed during the prior year. The report should:

1. Identify organizational or individual recipients of donations, whether cash or in-kind, in excess of \$500, and aggregate smaller contributions by categories of recipients such as community organizations, schools, medical groups, churches, political or social activism organizations, and the like;
2. Identify for donations not yet spent or used: the purposes to which the donations are to be put, any restrictions on the use of the donations, and any mechanisms by which the restrictions on donations will be monitored and enforced;
3. Identify for donations already spent or used: the purposes to which the donations were to be put, the purposes to which the donations were actually put, the method by which the use of the donations was monitored and ascertained, and an evaluation of the efficacy of the donation and the Company’s intention with regard to future donations to the organization;
4. Include management’s analysis of any risks to the Company’s brand, reputation, or shareholder value posed by all public controversies associated with the donations, including an explanation of the objective and consistent standards by which such controversies were discovered and their effect on the Company gauged; and
5. Identify, if and as appropriate, philanthropic areas or initiatives considered most germane to corporate values while posing less risk to Company reputation; or in the alternative, any decision to scale back without replacement risky or misused donations.

Supporting Statement

The SEC has long and consistently stated that charitable contributions by corporations are “generally found to involve a matter of corporate policy which is extraordinary in nature and beyond a company’s ordinary business operations,”¹ and so are amenable, without omission, to shareholder proposals that require reporting about them and about potential or realized risks and controversies arising from them, so long as the proposal relates, as this one does, to the corporation’s “charitable contributions generally,” rather than merely to some segment of the corporation’s contributions.²

¹ <https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2010/humanlife021910-14a8.pdf>

² <https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2017/johnharrington022817-14a8.pdf>

The need for reporting has grown acute in this shareholder season. Many contributions seem unlikely to raise material concerns.³ In recent months, however, the Company has made significant charitable commitments in response to political and social events, commitments that are highly divisive,⁴ not apparently successful in quelling rioter hate,⁵ and carry with them significant potential for misapplication to activities very risky to the Company's reputation. The Company's commitment to potentially problematic contributions remains vague: it has, for example, pledged \$1 million in contributions to unspecified organizations to promote "equity," an opaque term often suggesting radical and divisive commitments, in unspecified ways.⁶ It is therefore vital that the Company monitor carefully, and report to shareholders, the content of, intentions for, actual use of and lessons learned from its charitable contributions.

³ <https://www.starbucks.com/responsibility/community/starbucks-foundation>

⁴ <https://www.breitbart.com/politics/2020/06/02/silent-majority-poll-shows-american-voters-support-use-of-military-national-guard-in-riots/>

⁵ <https://thepostmillennial.com/amazon-and-starbucks-give-millions-to-blm-still-get-looted-and-destroyed>; <https://thepostmillennial.com/antifa-rioters-made-lists-of-seattle-businesses-to-destroy>

⁶ <https://stories.starbucks.com/stories/2020/starbucks-shares-update-on-standing-together-against-racial-injustice/>; <https://thepostmillennial.com/antifa-rioters-made-lists-of-seattle-businesses-to-destroy>

EXHIBIT B



STARBUCKS 2019

GLOBAL SOCIAL IMPACT REPORT



MESSAGE FROM KEVIN JOHNSON

Dear Starbucks partners, customers and stakeholders:

As we provide our 19th annual update on our global social impact activity, we also sit at a significant time in history that's requiring major changes to our business around the world as [quickly and dynamically](#) as possible to meet the needs of our partners, customers and communities during the COVID-19 pandemic.

Starbucks partners are showing how resilient they are in ways no one dreamed about a year ago. They're upping the ante every day on what our company represents: Using the ritual of connecting over coffee to uplift the everyday experience and drive deeper human connection.

Each one of us at Starbucks is forever changed from this pandemic, as are the communities we serve. It has underscored how important serving our customers and communities is to us, and it's brought new perspective and resonance to the ability Starbucks has to make the world a better place. This time is historic in an additional way, as many of our communities are coming together to protest racial injustice and highlight the vast improvement necessary in the way society treats people of color. Clearly, current events are showing us that executing our global social impact agenda successfully is now more important than ever.

INVESTING IN PEOPLE AND THE PLANET

Decades ago, Starbucks developed an agenda of global social impact priorities. In broad strokes, our investments have centered around balancing our role as a for-profit company with the betterment of people and the planet.

That means we invest in people – especially our partners, so they in turn can support people in the communities we serve. It also means we recognize healthy human lives depend on healthy ecosystems, so we work to better the health of our natural resources. As a result, we now have a long-term aspiration to be a resource positive company – storing more carbon than we emit, providing more clean freshwater than we use, and eliminating waste.

We can be proud of our Global Social Impact progress in fiscal year 2019. We continued working to put partners first and create a culture where everyone is welcome, including conducting a first-time, third-party [Civil Rights Assessment](#) that we continue to consider and implement. We worked to strengthen the communities where Starbucks partners live and work, expanding innovative grants, investments and community service models.



Chicago

We also invested in the future of greener cups, packaging and retail, foreshadowing a much [larger aspiration](#) we announced in January 2020. We invested heavily in supporting coffee communities, including dispersing a \$20 million [Emergency Farmer Relief Fund](#) to support smallholder farmers in Central America experiencing the effects of low global coffee prices.

As a testament to our increasing commitment to our people and planet priorities, we were proud late last year to hire our first global chief officer of sustainability, Michael Kobori; our first global chief officer of inclusion and diversity, Nzinga Shaw; and our first global chief officer of ethics and compliance, Tyson Avery.



Jakarta, Indonesia

Now in mid-2020, the world has changed, the needs are even greater, and we continue to thoughtfully examine how Starbucks can most responsibly and constructively serve our communities and our planet going forward.

The crisis we are navigating has underscored that our world is small, and we need to take care of it and each other. We understand the interdependency of the health of humanity and the health of the planet. We embrace diverse voices participating in these conversations, so we can hear varying points of view to make the best decisions. We feel the threat of greater economic disparity in the future, as COVID-19 is often impacting socioeconomically disadvantaged communities more than others.

Continued on next page



MESSAGE FROM KEVIN JOHNSON

From the onset of the pandemic, we have moved swiftly to take actions to address our people and planet priorities. We've acted to address urgent needs related to COVID-19 as detailed and updated [here](#). As an example, Starbucks has committed to a first-of-its-kind [\\$10 million emergency relief fund](#) for partners in both company-operated and licensed retail store markets around the world.

In the U.S. and Canada, we were able to provide [temporary benefits](#) for partners, more support for [food banks](#) and [free coffee](#) for first responders and frontline healthcare workers. Starbucks partners are [innovating](#) in other timely, locally meaningful ways. Our [partners in Asia](#) have led the way in organizing food and coffee donations to hospitals, nonprofits, local police and health officials, and other frontline workers. And our partners around the world have echoed those demonstrations of gratitude.

During the pandemic, we've had to pause on allowing reusable cups. But we continue our commitment to shift to more reusable packaging as well as more fully recyclable and compostable packaging, ensuring we also prioritize healthy and safety. This requires innovation from our own experts as well as many other alliances.



Hacienda Alsacia Coffee Farm, Costa Rica

Meanwhile, [The Starbucks Foundation](#) continues to invest millions of dollars to support a variety of organizations, extending emergency assistance to those in need while also helping to build a path towards recovery and resilience.

THIS IS WHO WE ARE

Making a positive social impact runs deep at Starbucks. Since the beginning, our purpose has gone beyond profit. We believe in the pursuit of doing good. The idea of Starbucks being a Third Place

for the community to gather means our stores have often served not only as a place for human connection, where everyone can feel welcome, but also as a [beacon of hope and resilience](#) during crisis – whether that's the aftermath of an earthquake, hurricane or a wildfire, or now as we re-open and strive to provide some normalcy in the midst of the global pandemic.

As always, Starbucks partners are the best champions of how to serve their own communities. We're finding success when we gain insights from the field, provide resources and tools to help inform local decisions, and enable partners to take actions that are locally relevant. Just as this approach applies to navigating the day-to-day COVID-19 situation as it varies in markets around the world, it also applies to defining relevant community service activities and guiding The Starbucks



Seattle

Foundation's approach to addressing local communities' needs. And it applies to our teams in our nine Farmer Support Centers in coffee-growing regions worldwide as they serve the needs of coffee farmers and their communities.

Because of our partners' inspiring daily actions, I'm more optimistic than ever that we can overcome this global challenge and emerge with deeper perspective about the role we should be playing as a for-profit enterprise that also has a great deal of power to make positive global social impact.

As Starbucks approaches its 50th anniversary in 2021, I hold those thoughts in my mind every day – that as we evolve our business in major ways, we must stay true to our heritage and what we stand for: People positive, planet positive and profit positive, working as partners to create a different kind of company for the next 50 years.

Kevin Johnson,
president and ceo



FOR US, THE PURSUIT OF PROFIT IS CONSISTENT WITH THE PURSUIT OF DOING GOOD

At Starbucks we stand for being people positive, planet positive and profit positive, living our [Mission and Values](#) while working together as partners to build a different kind of company. Our annual global social impact reporting focuses on three areas: leading in sustainability, creating meaningful opportunities, and strengthening our communities. These are areas critical to our business, and where we know we can have notable impact.

This summary serves as transparent acknowledgment of our efforts in fiscal year 2019, including what we have achieved to date, where we're falling short, and what is still to come. We hope you will continue to [join us on our journey](#).

OUR MISSION

To inspire and nurture the human spirit – one person, one cup and one neighborhood at a time.



Seattle



Hacienda Alsacia Coffee Farm, Costa Rica



Daegu, South Korea



Jonesboro, Ga.



New York





LEADING IN SUSTAINABILITY

Expanding on our [history in sustainability](#) and progress in building a more sustainable [future for coffee](#), we announced in January of 2020 a multi-decade aspiration to be a [resource-positive company](#), giving more than it takes from the planet. The announcement included science-based preliminary [target reductions](#) of carbon, water and waste by 2030. Informed by an [environmental baseline report](#) it outlined five strategies to move forward, such as shifting away from single-use to reusable packaging, and finding better ways to manage our waste. We'll share new commitments in the spring of 2021 as we celebrate Starbucks 50th anniversary.

COFFEE & TEA

FY19 PROGRESS

99% ETHICALLY SOURCED COFFEE

Goal: 100% ethically sourced coffee

For the fifth year in a row in FY19, more than 99% of our coffee was verified as ethically sourced under [C.A.F.E. Practices](#). Although we are constantly striving for 100%, the last 1% is where some of our most important work happens, bringing on new farmers and cooperatives to help ensure the long-term future of coffee. We continue to work as part of the [Sustainable Coffee Challenge](#) to make coffee the world's first sustainable agricultural product and improve the lives of at least one million people in coffee communities around the world.

40M TREES DISTRIBUTED SINCE 2015

Goal: Provide 100 million coffee trees to farmers by 2025

Starbucks has donated coffee trees over the past four years to farmers in Mexico, Guatemala and El Salvador. These climate-resilient trees replace ones that are declining in productivity due to age and disease, such as coffee leaf rust, and help improve the quality and yields of their harvests. As of June 2020, the next 10 million are being distributed, with close monitoring of potential complications related to COVID-19.

99% ETHICALLY SOURCED TEA*

Goal: 100% ethically sourced tea

We continue to work toward our goal of 100% ethically sourced tea, making significant progress from 95% in FY18 to 99% in FY19 by sourcing tea from farms that have been certified through Rainforest Alliance, UTZ, or Fair Trade.

*As purchased by Starbucks global tea sourcing team.

160K+ FARMERS TRAINED

Goal: Train 200,000 farmers by the end of 2020

Our Global Agronomy Center and Farmer Support Center at [Hacienda Alsacia](#) in Costa Rica and our eight other Farmer Support Centers around the world provide open-source training and other resources to coffee farmers. In FY19 alone, we trained nearly 88,000 farmers.

\$46M INVESTED IN FARMER LOANS

\$20M IN FY19 EMERGENCY RELIEF FUNDS

Goal: Invest \$50 million in farmer loans by the end of 2020

As of June 2020, we have invested more than \$49 million in the Starbucks [Global Farmer Fund](#) to support farmers. This comes in addition to relief funds, such as the \$20 million we dispersed in FY19 to many of our smallholder farmers in Central America who experienced the effects of low global coffee prices.

66K+ WOMEN IMPACTED SINCE 2018

Goal: Empower at least 250,000 women and families in coffee, tea and cocoa growing communities globally by 2025

Through 18 grants totaling more than \$5 million since 2018, The Starbucks Foundation is [supporting women and families](#) in coffee- and tea-growing communities across Africa, Asia and Latin America in many ways, including leadership skills, income-generating activities and healthier homes.





LEADING IN SUSTAINABILITY

GREENER CUPS & PACKAGING

FY19 PROGRESS

12 MAJOR CITIES RECYCLING STARBUCKS CUPS TRIALLING OF NEW CUP TECHNOLOGIES

Goal: Double the recyclability of our cups from 2016–2022; develop 100% compostable and recyclable hot cups by 2022

In 2016, 24% of Starbucks stores in the U.S. and Canada accepted our hot cups for recycling; in 2019, this number increased to 25%. Work accelerated in 2019, as the NextGen Consortium, of which Starbucks is a co-founder, identified 12 winning [cup technologies](#) of the NextGen Cup Challenge. In-store [market testing began](#) in the spring of 2020 with a cup that is industrially compostable as well as recyclable in markets that accept hot cups. We continue to research and test cup liner solutions that will make our cup easier to recycle and compost, while also working with the Consortium to improve recycling and composting infrastructure. In Europe, Starbucks launched a \$1 million [Cup Fund](#) supporting ambitious recycling projects in conjunction with the environmental charity Hubbub.

Starbucks cups currently are accepted for recycling in Amsterdam; Boston; Chattanooga; Dallas; Denver; London; Louisville; New York; San Francisco; Seattle; Vancouver; Washington, DC; and many smaller cities.

10% POST-CONSUMER FIBER

Goal: 20% recycled content in our hot cups by 2022

Starbucks hot cups currently contain 10% post-consumer fiber (PCF), and we are working to double the recycled content to 20% as well as reduce the environmental impacts of sourcing virgin wood paper fiber we source.

2.8% REUSABILITY RATE IN MEASURED MARKETS

Goal: Double the use of reusable cups from 2016–2022

In 2019 we implemented new ways to track reusable cup usage, and we tracked a 2.8% reusability rate in company-operated stores in the U.S., Canada, Japan, and EMEA. This meant that customers received a discount for bringing their own cup or used a ceramic mug offered in store, saving more than 105 million disposable cups. China is not yet included in this metric, with a tracking program now in development there. In Europe, Starbucks conducted the first ever [airport reusable cup trial](#) at London's Gatwick Airport.

We continue to conduct research and evolve our strategy to encourage customer adoption of reusables.

CONTINUED ROLLOUT OF STRAWLESS LIDS AND SUSTAINABLE MATERIAL STRAWS

Goal: Eliminate single-use plastic straws globally by the end of 2020

In 2019 Starbucks continued the expansion of [lightweight strawless lids](#) for cold beverages, as well as rollout of alternative material straws. By the end of calendar year 2020, we anticipate that all company-owned stores and the majority of licensees will have eliminated single-use plastic straws. However, regulatory and manufacturing challenges in light of COVID-19 threaten the ability to fully roll out a new sustainable material straw in the U.S. and Canada by the end of 2020, with a new anticipated goal date of spring 2021. Starbucks will continue to provide straws to customers who [need or request them](#) in our stores.





LEADING IN SUSTAINABILITY

GREENER RETAIL

FY19 PROGRESS

741 STORES GLOBALLY THAT REFLECT THE GREENER STORES FRAMEWORK

Goal: Build and operate 10,000 greener stores globally by 2025

Starbucks has built more than 1,600 LEED®-certified stores around the world, and in early FY20, the [Shanghai Roastery](#) set a new benchmark in green retail as the first in mainland China's food retail industry to be certified LEED Platinum. Now in partnership with the World Wildlife Fund and in collaboration with other nongovernmental organizations, we're going beyond LEED, expanding the scope and breadth of our greener stores commitment with an open-source [Greener Stores framework](#) for design, construction and operation.

14,800 GREENER APRON PARTNERS

Goal: Empower 10,000 partners to be sustainability champions by the end of 2020

In FY19, we surpassed our goal and as of April 2020 have more than 26,000 Starbucks partners enrolled in the Greener Apron sustainability training program through [Starbucks Global Academy](#).



Seattle



Seattle

72% OF GLOBAL OPERATIONS POWERED BY RENEWABLE ENERGY

Goal: Invest in 100% renewable energy to power global operations globally by the end of 2020

Starbucks purchases enough renewable energy to power 100% of its company-operated stores in the U.S., Canada and the UK. Worldwide in FY19, 72% of Starbucks operations were powered by renewables. This is down from 77% in FY18, driven in part by a transition away from company-owned renewable energy-powered markets in EMEA, as well as an increase in stores in markets where Starbucks is still building a path toward renewable energy, such as China and Japan.

As we work to buy more renewable energy, we also continue to invest in solar and wind farms, with 2019 highlights being investments in a large [wind farm](#) in Illinois and [solar farms](#) in Texas.



Wharton, Tex.





CREATING MEANINGFUL OPPORTUNITIES

Since our founding, Starbucks has a long legacy of putting our partners first and creating a culture where everyone is welcome. In 2019, we published a [Civil Rights Assessment](#) in which Covington & Burling LLP evaluated our ongoing efforts related to diversity, equity and inclusion and how they support our mission and values. We [continue to track](#) annually against this assessment, reviewing its recommendations as we plan. Our equity and inclusion activity is updated regularly [here](#).

Among partners, our approach is to create meaningful opportunities by investing in their health, well-being, and overall success, all while working to advance a culture of equity and inclusion. This means ensuring that leadership demonstrates commitment and accountability to inclusion and diversity. It means building collective understanding among all partners, and cultivating a more inclusive workplace, where partners feel valued and a sense of belonging. It means building and sustaining a highly engaged, high-performing, and diverse workforce at all levels. And it means ensuring equal opportunity, pay equity, and proactive workplace resolutions.

PARTNERS

FY19 PROGRESS

3,200+ DIPLOMAS, WITH 14,000+ PARTICIPANTS

Goal: Graduate 25,000 Starbucks partners from Arizona State University (ASU) by the end of 2025

Starbucks College Achievement Plan is helping partners complete their education through Arizona State University (ASU) online. We are proud to continue to lead in this area, providing 100% tuition reimbursement to partners that work an average of 20 hours a week or more. As of June 2020, more than [4,500 partners](#) have earned first-time bachelor's degrees since the program was announced in 2014.

We also continue to expand the [Starbucks Global Academy](#), a globally accessible platform created in partnership with ASU for Starbucks partners as well as customers, community members, and learners around the world that delivers world-class learning content and eliminates barriers to high quality education.

NEW U.S. AND CANADA MENTAL HEALTH INITIATIVE AND FAMILY SUPPORT BENEFITS

Goal: Continued leadership in innovative, relevant benefits for full- and part-time retail employees

Starbucks continues to pioneer [innovative benefits](#) for our full- and part-time partners in the U.S., and internationally, we continue to customize our compensation packages to remain competitive and responsive to partner feedback.

The new [mental health initiative](#) announced to U.S. and Canadian partners in FY19, with further rollout in early FY20, includes efforts to break the stigma around mental health needs, connect partners to quality care that meet their specific needs, and provide ongoing training to 12,000 store managers and field leaders. In FY19 we also announced new reimbursement for uncovered surrogacy and intrauterine insemination in the U.S. and Canada.



Yuba City, Calif.





CREATING MEANINGFUL OPPORTUNITIES

PARTNERS

FY19 PROGRESS

100% PAY EQUITY IN THE U.S.

100% GENDER EQUITY IN PAY IN CANADA AND CHINA

Goal: 100% global gender pay equity in U.S. and company-owned markets

Our pay equity achievements to date were reached in FY18 and maintained with continued rigor in FY19. We continue to work toward [global pay equity](#). In 2019 the median pay for women globally was 98.3% of the median for men, while in the U.S., the median pay ratio was 100% for women and 100% for people of color.

In the U.S., Starbucks and 25 other U.S. employers in the [Employers for Pay Equity](#) consortium agreed in 2019 to work with a shared set of [Pay Equity Principles](#). We have established U.S. best practices supporting these principles. Going forward we will establish global best practices as well.

42% WOMEN IN SENIOR LEADERSHIP

17% PEOPLE OF COLOR IN SENIOR LEADERSHIP

Goal: At the senior leadership level, 50% women and a 50% increase in representation by people of color since 2015

In addition to our goals related to staff leaders, our board is currently comprised of 38% women, four of whom are members of minority groups. Starbucks first Global Chief Inclusion & Diversity Officer, Nzinga Shaw, was hired in November 2019. In an [Update to Starbucks Civil Rights Assessment](#) the company has set new representation goals for the first time across all roles, including, at minimum, a goal of 40% people of color and 55% women in all retail roles, and 50% women and 30% people of color for all enterprise roles, by 2025.

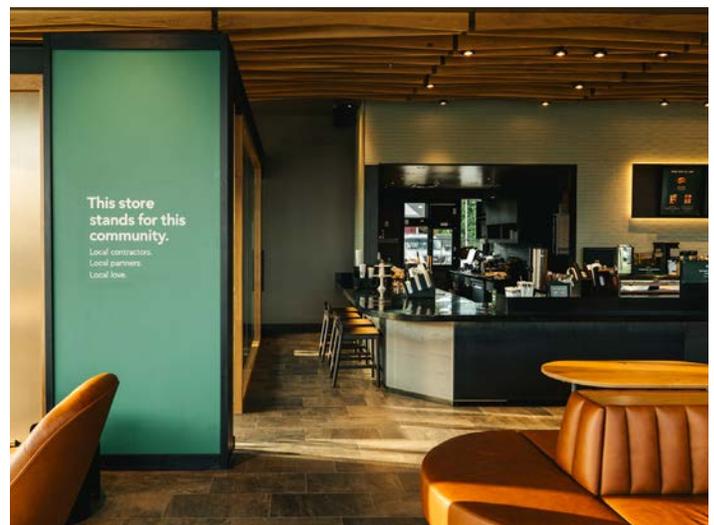
~175K PARTNERS PARTICIPATING IN ANTI-BIAS TRAINING SINCE 2018

Goal: Cultivation of inclusion and diversity awareness

Following Starbucks [Civil Rights Assessment](#) in January of 2019, we have implemented several recommendations and continue to review them as we plan. In FY19, we published principles on [upholding the third place](#) and rolled out new resources for partners including [To Be Welcoming](#), a 15-course online curriculum designed to address bias through understanding the human experience; the course is also available to customers.



Jonesboro, Ga.





CREATING MEANINGFUL OPPORTUNITIES

COMMUNITIES

FY19 PROGRESS

61,000+ OPPORTUNITY YOUTH HIRED

Goal: Hire 100,000 Opportunity Youth by the end of 2020

These [hiring commitments](#) are intended to welcome new partners from communities that may experience barriers to employment. The FY19 status for Opportunity Youth is a decrease from the FY18 status due to an identified technical error.

~28,000 VETERANS AND MILITARY SPOUSES HIRED

Goal: Hire 25,000 veterans and military spouses by 2025

We met our military hiring goal [six years early](#), with a new goal set to hire 5,000 veterans and military spouses annually. More detail on our military commitment is [here](#).

~2,100 REFUGEES HIRED

Goal: Hire 10,000 refugees globally by 2022

We continue to collaborate with other employers to share best practices and build partnerships with refugee-serving organizations. Starbucks EMEA has hired refugees in 12 countries across the region in partnership with local non-governmental organizations.

\$7.5B SPENT WITH DIVERSE SUPPLIERS SINCE 2000

Goal: Stimulate economic development in the communities Starbucks serves while delivering high-quality products and services

Starbucks Supplier Diversity and Inclusion program drives inclusion of qualified women-, minority-, people with disabilities-, veteran-, LGBTQ- and small (8(a) and HUBZone)-owned suppliers throughout our supply chain. To continue these efforts, we will focus on suppliers of all sizes and will include mentorship components to assist suppliers in developing to a point where they can succeed as a Starbucks supplier.



Crestview, Fla.



New York



Dallas





STRENGTHENING OUR COMMUNITIES

At Starbucks we take actions to strengthen our communities by listening, supporting, investing and uplifting in meaningful ways – whether that’s the neighborhoods that host our stores, or the regions that grow our coffee. In late FY19 at Starbucks [Leadership Experience](#), we rolled out new resources and tools to empower 12,000 store leaders in the U.S. and Canada to serve their communities in ways that align to Starbucks global social impact priorities and are also locally relevant. We’ve seen success from this especially during the COVID-19 pandemic, with examples tracked [here](#).

COMMUNITY SUPPORT

FY19 PROGRESS

16 COMMUNITY STORES

Goal: Open Community Stores in 15 diverse, low to medium income urban communities in the U.S. by the end of 2020

We’ve invested globally in 16 Community Stores, 14 in the U.S., one in South Korea, and one in Thailand, which provide extra services and resources specific to their communities. In the U.S. in FY19, new stores opened in Dallas, Birmingham, Ala. and Jonesboro, Ga., with an expanded commitment in early 2020 to [operate 100 of them](#) by 2025.

65 MILITARY FAMILY STORES IN THE U.S.

Our [Military Family Stores](#) create a welcoming space to bring active duty military and their spouses together with their communities.

3 SIGNING STORES GLOBALLY

Our [Signing Stores](#) are designed to provide employment opportunities for deaf and hard of hearing people and drive greater connection within that community.

1,500+ COFFEE WITH A COP EVENTS IN STARBUCKS STORES SINCE 2017

Goal: Promote dialogue, empathy and stronger neighborhoods through by building relationships with law enforcement and first responders

Building trusted relationships with law enforcement is an important part of sustaining a welcoming and safe environment in its stores. Starbucks has continued to build relationships and trust with law enforcement through alliances with national organizations as well as interactive [Coffee with a Cop](#) events.

20M+ MEALS DONATED IN THE U.S., WITH ~60% OF ELIGIBLE STORES PARTICIPATING

Goal: Rescue 100% of food available to donate in all U.S. company-operated stores

Starbucks FoodShare program in the U.S., which launched in 2016 in partnership with Feeding America, packages eligible unsold food and provides meals to food banks and mobile pantries. As of June 2020, we’ve now donated more than 25 million meals, with recent spikes as [food bank needs](#) increase. We continue to learn from the many logistical challenges of ongoing perishable food delivery as we increase the scale of this program.

Internationally, similar programs exist in several markets, including a FoodShare launch in Canada in FY19 and food waste programs in 13 countries across EMEA.



San Antonio





STRENGTHENING OUR COMMUNITIES

THE STARBUCKS FOUNDATION

FY19 PROGRESS

SERVICE FELLOWS PROGRAM LAUNCH

Goal: Test an innovative community service model

After a successful test in FY19, we expanded [The Starbucks Foundation Service Fellows](#) program, in which 100 Starbucks hourly store partners in 20 cities work 20 hours in their store each week while spending another 20 hours with a local nonprofit. The program is catalytic in communities that need support and provides an opportunity for Starbucks partners to build local nonprofit capacity and further serve their communities.



Santa Cruz, Calif.

~\$16M IN GRANTS

Goal: Strengthen local communities

The Starbucks Foundation provided nearly \$16 million in grants in FY19, including:

- \$1M toward disaster relief
- Nearly 500 Neighborhood Grants in the U.S. and Canada totaling more than \$700K
- 63 Opportunity for All Grants totaling \$1.4M
- \$2M generated during holiday giving to 8 nonprofit organizations
- [Origin grants](#) as detailed on [page 5](#)

Internationally, The Starbucks Foundation invested in programs that promote opportunity, from refugee employment programs in Europe to youth-focused grants in partnership with the Alsea Foundation across multiple Latin American markets.

In the U.S., The Starbucks Foundation has a partnership with the American Red Cross supporting disaster preparedness, response and recovery in the U.S. Responses in FY19 included those to Hurricane Dorian and mass shootings in El Paso and Dayton.

The Starbucks Foundation's [Neighborhood Grants](#) help build sustained local impact and inspire increased partner volunteerism with nonprofit organizations that work in our communities. This program was launched in FY19, inviting hundreds of store managers to nominate local nonprofit organizations that are meaningful in their communities. Similarly, The Starbucks Foundation awarded Greener Apron grants to multiple environmental organizations submitted by Greener Apron-certified partners.

The Starbucks Foundation's [Opportunity for All Grants](#) help support organizations creating pathways to lifelong opportunity and programs, which create job and training opportunities for people who may face barriers.

The Starbucks Foundation celebrated the holiday season by matching customer donations to eight nonprofit partners through the [Match the Magic](#) campaign.



ABOUT THIS REPORT

SCOPE

Our Global Social Impact report for fiscal 2019 focuses on the goals in our three key social impact areas: leading in sustainability, creating meaningful opportunities and strengthening our communities. We've also included links to information and resources publicly available at stories.starbucks.com and starbucks.com regarding financial, corporate governance work, workplace and diversity policies and performance, because these commitments are directly tied to our business.

Starbucks is committed to United Nations Sustainable Development Goals and uses these goals as a lens for our social impact programs and collaborations with others. Based on our stakeholder engagement efforts, we also believe these areas are important to our customers, our partners, non-governmental organizations (NGOs) and investors.

REPORTING YEAR

Starbucks fiscal year 2019 (October 1, 2018 through September 29, 2019), unless otherwise noted.

CURRENCY

All references to currency are in U.S. dollars, unless otherwise noted.

PREVIOUS REPORTS

Starbucks has produced an annual global social impact report since 2001. [Previous annual reports](#) are available on our website. We also submit performance and data to key industry-recognized reports such as the Dow Jones Sustainability Index and the Carbon Disclosure Project annual carbon emissions report.

INFORMATION INTEGRITY

Starbucks management is responsible for the preparation and integrity of the information reported for fiscal 2019. Through a system of internal controls, including a comprehensive verification process involving internal subject matter experts, we believe this information accurately represents our global responsibility activities and performance results for the fiscal year. External verification over specified metrics is provided by Moss Adams LLP.

FORWARD-LOOKING STATEMENTS

Our reporting on global responsibility for fiscal 2019 includes forward-looking statements about the company's business and its future business plans, initiatives, goals and objectives. These forward-looking statements are based on currently available operating, financial and competitive information and are subject to a number of significant risks and uncertainties. Actual future results may differ materially depending on a variety of factors including impact of COVID-19 on our business operations; regulatory measures or voluntary actions that may be put in place as a result of COVID-19, coffee, dairy and other raw material prices and availability; successful execution of the company's blueprint for growth and other strategies; cost reduction and other initiatives; and other risks detailed in the company's filings with the Securities and Exchange Commission, including the "Risk Factors" section of Starbucks Annual Report Form 10-K for the fiscal year ended September 29, 2019 and Starbucks Quarterly Report on Form 10-Q for the fiscal quarter ended March 29, 2020. The company assumes no obligation to update any of these forward-looking statements.

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