



CODE OF BUSINESS CONDUCT AND ETHICS

Purpose

CAVA Group, Inc. ("we," "us," "our" or the "Company") is committed to providing superior quality and unparalleled guest service in all aspects of our business. As one team, we are values focused, and expect all of our employees ("team members"), officers and directors (collectively, the "Covered Parties") to exhibit behaviors reflective of our values and to follow the highest standards of ethical conduct. The purpose of this Code of Business Conduct and Ethics (the "Code") is to provide a framework for making ethical business decisions, to establish the importance of exercising sound judgment, and to recognize the shared values we have with all Covered Parties and our guests, vendors, and other parties with whom we do business. It also constitutes our code of ethics under applicable rules of the Securities and Exchange Commission (the "SEC") and The New York Stock Exchange.

Scope

The Code applies and is intended to assist all Covered Parties in making decisions about their conduct. All Covered Parties must read the Code carefully and are required to sign an acknowledgement affirming their commitment to the principles in the Code and acknowledging the fact that they understand the contents as well as the consequences of non-compliance. In the case of non-employee directors, compliance with the Code is subject to the provisions of the Company's Certificate of Incorporation, Bylaws and any stockholder's agreements with the Company.

The Code is designed to:

- Support honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Support compliance with applicable governmental laws, rules and regulations and policies;
- Support full, fair, accurate, timely and understandable disclosure in reports and documents that we file with, or submit to, the SEC and any public communications that we make;
- Support the protection of our assets, including business opportunities, trade secrets and confidential information;

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- Promote the prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code;
- Support ethical and respectable behavior by all Covered Parties and those parties with whom we do business, in all aspects of our business; and
- Support accountability for and adherence to the Code.

The Code is not intended to be an all-inclusive list of all laws, regulations, behaviors and other norms applicable to us. Accordingly, the Code emphasizes and clarifies a standard of ethical conduct that must govern all of our business dealings and relationships. Additional policies and guidelines are available for review, and others will be developed from time to time.

Ethical Conduct

We are committed to promoting a culture that encourages ethical conduct and compliance with laws and regulations in all aspects of our business. As it is vital to our reputation, credibility and our prosperity, this commitment must be reflected in all our relationships with Covered Parties and our guests, vendors, competitors, the government, the media, and the communities in which we operate.

Our ethical responsibilities are to: conduct business in compliance with applicable laws, rules, regulations and our policies; treat all in a truthful and fair manner; avoid situations that present a conflict with our interests; safeguard and use properly all our information, assets and resources, as well as those of our guests and those with whom we do business; and ensure integrity in every business decision.

Every Covered Party at any level or in any part of our organization holds a position of trust. All Covered Parties have an individual responsibility to uphold these ethical behaviors, to follow all legal requirements and ethical business practices.

Our directors, officers and managers, by virtue of their positions of authority, must be ethical role models for all team members. They must exhibit the highest standards of integrity in all dealings with all persons and always exercise sound business judgment in the performance of their duties. They must communicate the seriousness of our expectations of ethical conduct. Our directors, officers and managers must foster a working environment that encourages team members to voice concerns or otherwise seek assistance if faced with potentially compromising situations and also support those who raise such concerns and protect them from any retaliation.

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Conflicts of Interest

A conflict of interest is when an individual's personal interests – family, friendships, financial, or social factors – interferes in any way, or even appears to interfere, with the interests of the Company as a whole. A conflict of interest can arise when an individual takes actions or has interests that may make it difficult to perform their work for us objectively and effectively. Both the fact and appearance of a conflict of interest must be avoided.

Conflicts of interest also arise when an individual, or their immediate family member, receives improper personal benefits as a result of their position with us. It is crucial to avoid any possible conflicts of interest whether real or perceived. An immediate family member may refer to and includes an individual's spouse, parents, stepparents, children, stepchildren, siblings, mothers- and fathers-in-law, sons- and daughters-in-law, and brothers- and sisters-in-law.

Team members must disclose any outside activities, financial interests or relationships that present a conflict of interest or the appearance of a conflict of interest to their direct manager, if applicable, and the Chief Legal Officer ("CLO") or his or her designee, as soon as the conflict or appearance of a conflict arises. A determination will be made as to whether the incidence could present an actual or potential conflict of interest, and what action will be taken.

Some examples of conflicts of interest include, but are not limited to:

- Using our money, assets, talents, information, technology, name or influence for an individual's personal benefit or gain, except as authorized by and in connection with their employment.
- Taking for themselves business opportunities that are discovered through doing business with us or on our behalf.
- Requisitioning, ordering, approving or otherwise participating in the purchase of goods or services on behalf of us from any person or entity if the individual or any member of the individual's family or household has a substantial financial interest in the vendor.
- Soliciting or accepting from guests, vendors or others with whom we do business with any kind of gift or entertainment of more than immaterial value or other personal, unearned benefits of comparable value as a result of that individual's position or relationship with us.
- Having a consulting, managerial or employment relationship with a competitor, vendor, or others dealing with us.
- Acquiring real or intellectual property or rights in which we have, or the individual knows or has reason to believe at the time of acquisition that we are likely to have, an interest related to our business.

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- Accepting loans or guarantees of obligations from any individual, organization or entity doing or seeking to do business with us.
- Accepting loans or guarantees of obligations from other persons employed by the Company or other Covered Parties.
- Acquiring any interest in property or assets of any kind for the purpose of selling or leasing it to the Company.
- Committing the Company to give its financial or other support to any outside activity or organization for personal gain.
- Developing a personal relationship with any employee of the Company that might interfere with the exercise of impartial judgment in decisions affecting the Company or any employee of the Company.

Actual or potential conflicts of interest involving directors, director nominees, our executive team or team members with the title of Vice President and above must be referred to the CLO and the Chair of the Audit Committee for consideration. The Audit Committee must review and approve such conflicts of interest by a majority vote of disinterested directors. Should you have any questions about whether you are subject to such to a conflict of interest that must be reported, please consult People and Culture.

Corporate Opportunities

Except as may otherwise be provided in our Certificate of Incorporation, Bylaws or any stockholder's agreement with the Company, Covered Parties and each of their immediate family members must not, for personal or any other person's or entity's gain, (1) take for themselves any opportunities that discovered through the use of Company property, information or position, (2) use Company property, information or position for personal gain and (3) compete with the Company directly or indirectly. If any Covered Party learns of any such opportunity through their association with us, they may not disclose it to a third party or invest in the opportunity without first offering it to us. All Covered Parties owe a duty to the Company to advance our legitimate interests whenever possible.

Fair Dealing

Covered Parties shall behave honestly and ethically at all times and with all people. Covered Parties shall act in good faith, with integrity and due care, and shall engage only in fair competition, by treating colleagues, competitors and other third parties ethically.

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Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing improper disclosure of such information by past or present employees of other companies is prohibited. No Covered Party should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or similar unfair-dealing practice.

Protection and Proper Use of Company Assets

Covered Parties should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have an impact on the Company's profitability. All Company assets should be used for legitimate business purposes. Any suspected incident of fraud or theft should be immediately reported for investigation. The Company's equipment should not be used for non-Company business, though incidental personal use is permitted.

Board of Directors and Committee Membership

All executive officers and team members with the title of Vice President and above must obtain approval from our Chief People Officer ("CPO") or CLO before agreeing to serve on the board of directors or similar body of any for-profit enterprise or government agency. Directors should advise the Chair of the Board of Directors in advance of accepting an invitation to serve on a Board of Directors of another for-profit company or a significant not-for-profit enterprise.

For all team members, serving on boards of not-for-profit or community organizations does not require prior approval. However, if service with a not-for-profit or community organization creates a situation that poses a conflict of interest with us, a team member should contact People and Culture for approval.

Political and Other Activities

Prior to seeking any election or appointment to public office and/or service at any level of government, including serving on or advising boards and commissions, directors, executive officers and team members with the title of Vice President and above must notify the CPO or CLO to clarify our position in the event the candidacy is successful or the appointment is made.

Subject to the limitations imposed by the Code, all team members are free to engage in outside activities that do not interfere with the performance of their responsibilities or present a conflict of interest. Where activities may be of a controversial or sensitive nature, team members are expected to seek the

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guidance of the CPO or CLO or their respective designee before engaging in such activities. A Covered Party must not use their position or title or any of our equipment, supplies or facilities in connection with outside activities, nor may an individual do anything that might infer sponsorship or support by us of such activity, unless they have received approval in writing from the CPO or CLO or their respective designee.

Team members should not solicit contributions or other support from fellow team members or distribute non-work-related material to other team members during working hours or in areas where work is being performed.

Political Contributions

Federal and many state laws prohibit corporations from making certain types of political contributions. Our resources may not be expended on or on behalf of any political campaign or cause.

Contact with Governments and Public Officials

Covered Parties must conduct business with all governmental representatives with the highest ethical standards and in compliance with applicable laws and regulations, including, but not limited to, the special requirements associated with government transactions, and other applicable laws. If you have questions on the applicability of these laws, ask your direct manager, if applicable, or contact a member of the Company's Legal Department or his or her designee.

Compliance with Applicable Laws, Rules and Regulations

All Covered Parties must obey all applicable laws, rules and regulations in the United States and in any non-U.S. jurisdiction in which the Company does business (if applicable). Although not all persons subject to the Code are expected to know the details of these laws, it is important to know enough about the applicable local, state and national laws to determine when to seek advice from a member of the Company's Legal Department, his or her designee or such other appropriate person.

Team Member Wage and Hour

We are committed to full compliance with all applicable wage-hour laws and regulations. We have implemented policies and procedures that are designed to carry out this commitment. It is each team member's duty to comply with our wage-hour policies and procedures strictly and to report any possible non-

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compliance to a manager or to People and Culture without delay. Managers must ensure compliance in these matters, both in performing their own work and in supervising the conduct of others, including by investigating any reports of potential violation and by taking appropriate action.

Accounting Practices

As it is vital to our reputation, credibility, our prosperity, as well as, in many circumstances, legal compliance, that the integrity of our books and records, including our financial, environmental, health and safety, human resources, and intellectual property records, be resolutely maintained. The responsibility for this does not rest exclusively with Accounting or other Finance teams and instead it is shared by us all. Accordingly, all Covered Parties shall comply with our accounting principles, procedures and controls and the laws of each applicable jurisdiction, and:

- No transaction shall be effected and no payment shall be made on our behalf with the intention or understanding that the transaction or payment is other than as described in the documentation evidencing the transaction or supporting the payment;
- No false, artificial or misleading entries in any of our books or records shall be made for any reason whatsoever;
- No Covered Party shall issue or authorize anyone else to issue any of our documents that is false or misleading;
- No Covered Party will knowingly accept and treat as accurate any false or misleading document prepared by a person not employed with us; and
- No Covered Party will knowingly make any false or misleading statements to our external or internal auditors. When questioned by any auditor, all Covered Parties should be fully forthcoming.

Our periodic reports and other documents, including all financial statements and other financial information, must comply with generally accepted accounting principles and all applicable laws. Each Covered Party who contributes in any way to the preparation or verification of our financial statements and other financial information must ensure that our books, records and accounts are accurately maintained.

Maintaining a Respectable Workplace

We are committed to creating and maintaining a respectable workplace where all team members are supported to reach their potential and grow with us. We

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adhere to the highest service standards, always seeking to be values focused. Every team member must display a positive attitude towards the performance of their individual duties, to ensure that we provide our guests with quality service.

Team members are expected to perform excellent work, to strive for quality and productivity, to follow directions and instructions, to properly care for facilities and equipment, to anticipate problems and suggest improvements, to treat other team members, guests, vendors and those whom we do business with, with courtesy and respect in the performance of their job duties.

We are committed to providing equal employment opportunities to all team members and applicants without regard to race, religion, color, sex, gender, gender identity, or expression, sexual orientation, national origin, ancestry, citizenship status, uniform service member and veteran status, marital status, pregnancy (including childbirth, breast feeding, and related medical conditions), age, protected medical condition, genetic information disability, or any other protected status in accordance with all applicable federal, state, and local laws.

In addition, certain activities are prohibited because they are not consistent with the type of workplace we strive to achieve.

Asking Questions and Reporting Violations

Any team member who has questions or concerns regarding suspected or alleged violations must promptly report such matters to their direct manager. Any manager who receives a report of suspected or alleged violations must promptly report such matters to the CLO or his or her designee. If a team member believes that their direct manager is involved in the problem, such team member shall discuss the issue with the next level manager or reach out directly to People and Culture.

Officers and directors must promptly report any suspected or alleged violations to a member of senior management or the CLO.

All persons can direct questions and/or concerns:

- Through People and Culture Connect by email: cavahr@cava.com
- By leaving a voicemail at: (202) 517-7445 (and either requesting a call back or remaining anonymous)
- By calling our whistleblower hotline or accessing the whistleblower portal, as further described below under the Protection from Retaliation / Whistleblower Policy section

Any Covered Party may choose to remain anonymous and the Company will accept a report submitted anonymously. When you raise concerns, your privacy

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will be respected to the fullest extent possible under the law, and consistent with our obligation to investigate the allegation or violation.

Covered Parties may not knowingly and falsely file a complaint.

We promptly review and investigate all reported concerns and complaints. Depending on the nature of the allegations, the investigation will be handled by People and Culture. Those responsible for the investigation will maintain the confidentiality of the allegations of the complaint and the identity of the persons involved, subject to the need to conduct a full and impartial investigation, remedy any violations of the Company's policies, or monitor compliance with or administer the Company's policies. As part of any investigation, we will examine what policies or policies (if any) were violated and determine appropriate resolution.

Protection from Retaliation / Whistleblower Policy

The Company prohibits discrimination, harassment and/or retaliation against any Covered Party who provides information or otherwise assists in an investigation or proceeding regarding any conduct which he or she reasonably believes to be a violation of law, Company policies and concerns, complaints regarding accounting, internal accounting controls and auditing matters, federal securities laws, violations of federal laws regarding mail fraud, wire, or bank fraud, the rules or regulations of the SEC, or any provision of federal law relating to fraud against stockholders. Everyone at the Company is responsible for assuring that the workplace is free from all forms of discrimination, harassment and retaliation prohibited by the Code. No Covered Party has the authority to engage in any conduct prohibited by the Code.

Covered Parties have a duty to report misconduct or violations of the law, the Code or Company policy.

The Code protects any Covered Party who, among other things:

- Provides information, causes information to be provided, or otherwise assists in an investigation regarding what the Covered Party reasonably believes to be an alleged violation of the federal securities laws, the federal laws regarding mail fraud, wire, or bank fraud, the rules or regulations of the SEC, or any provision of federal law relating to fraud against stockholders to a federal regulatory or law enforcement agency, any member or committee of Congress, any person with supervisory authority over the employee, or any other person working for the Company who has the authority to investigate, discover or terminate misconduct;

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- Files, causes to be filed, testifies, participates in, or otherwise assists in a proceeding filed or about to be filed under the federal securities laws, the federal laws regarding mail fraud, wire, or bank fraud, the rules or regulations of the SEC, or any provision of federal law pertaining to fraud against stockholders; or
- Makes a confidential complaint, whether anonymous or otherwise, about questionable accounting, internal accounting controls, or auditing matters at the Company.

If a Covered Party engages in any of the activities listed above, the Company will not discharge, demote, suspend, threaten, harass or otherwise discriminate or retaliate against him or her in the terms or conditions of employment because of that activity. However, actions taken by the Company based upon a Covered Party's performance will be separately handled. Notwithstanding, the Company does not authorize the waiver of, or disclosure of information covered by, the attorney-client privilege or attorney work product doctrine or any other privilege or protection belonging to the Company.

A Covered Party may, in his or her sole discretion, report to the Audit Committee or CLO, openly or confidentially and/or anonymously, any Accounting Allegation, Compliance Allegation or Retaliatory Act (each as defined in the Company's Whistleblower Policy) in the following manner:

- in writing to CAVA Group, Inc., Attn: Audit Committee or, CLO, 14 Ridge Square NW, Suite 500, Washington, D.C. 20016;
- by calling our whistleblower hotline at (800) 916-7037 (and providing the following company identifier: 2282) at any time; or
- by accessing the Company's whistleblower portal at https://irdirect.net/CAVA/whistleblower_iframe/.

Cooperating with Investigations

We take allegations of misconduct very seriously. If you become aware of an internal investigation or if you are asked to provide information or to assist with an internal investigation, you are required to cooperate and disclose information in a complete and truthful manner. If you interfere with or provide false information during the course of the investigation, you may be subject to disciplinary action, including immediate termination.

From time to time, government agencies may investigate restaurant companies, and we are committed to fully cooperate with any government investigation, regardless of whether or not the investigation is focused on our activities. If you have any questions, or you are ever contacted by an investigator, (i) contact



People and Culture if you are a team member and (ii) contact the CLO if you are a director or officer.

Business Entertainment and Gifts

Covered Parties and their immediate family members should not offer or provide or accept, directly or indirectly, any gift, entertainment or reimbursement of expenses unless it (1) is consistent with customary business practices, (2) is not excessive in value, (3) cannot be construed as a bribe or payoff and (4) does not violate any laws or regulations. Covered Parties or their immediate family members should also refrain from offering or providing, directly or indirectly, any gift or service to any individual in a position to make or influence any business or governmental decision. In addition, the various branches and levels of government have different laws restricting gifts, including meals, entertainment, transportation and lodging, that may be provided to government officials and government employees. The offer or acceptance of cash gifts or cash equivalents to or from an investor, prospective investor, or any entity that does or seeks to do business with or on behalf of the Company by a Covered Party is prohibited.

Any question as to whether a gift or payment would be considered improper under the Code or local, state or national laws must be discussed with the CPO or CLO or their respective designee.

Prohibition of Loans

It is inappropriate to make any loans to any officer or director of the whether directly or indirectly or guaranteeing any loan or obligation on behalf of any officer or director.

Referral Fees

Covered Parties may refer service providers or other parties that we do business with to other third parties. However, they may not accept any fee, commission, or other compensation related to this activity.

Insider Trading

Covered Parties may not provide any kind of confidential information about the Company to anyone outside the Company. This prohibition extends to family members who reside with the Covered Party, anyone else who lives in the Covered Party's household and any family members who do not live in the

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household but whose transactions in the Company's securities are directed by the Covered Party or are subject to their influence or control.

Federal securities laws generally prohibit trading in the securities of a company if aware of "inside" information. These transactions are commonly known as "insider trading". It is also generally illegal to recommend to others (commonly called "tipping") that they buy, sell or retain the securities of a company to which such inside information relates. This includes any communication providing inside information on social media or other internal or external Internet platforms. Anyone violating these laws is subject to personal liability and could face significant fines and criminal penalties, including imprisonment.

The prohibition applies to Company securities and to securities of other companies if the Covered Party learns material nonpublic information about other companies, such as information relating to the Company's customers, vendors, competitors or acquisition targets, as a result of employment with or relationship to the Company.

Information is generally considered "material" if there is a substantial likelihood that the information would be viewed by the reasonable investor as having significantly altered the total mix of information made available such that it would likely have impacted the price of the security. The information may concern the Company or another company and may be positive or negative. In addition, it should be emphasized that material information does not have to relate to a company's business; information about the contents of a forthcoming publication in the financial press that is expected to affect the market price of a security could well be material. Covered Parties should assume that information that would affect one's consideration of whether to trade, or which might tend to influence the price of the security, is material.

Prohibition against Prediction Markets

Prediction Markets are platforms that allow participants to place bets/wagers, trade contracts or otherwise speculate on future events. Examples of popular prediction markets are Kalshi, Polymarket, Robinhood, DraftKings and OG.com.

Covered Parties are prohibited from:

1. Placing bets/wagers, trading contracts or participating on prediction markets in any manner, that in any way involves the Company, our customers, suppliers, competitors or restaurant industry matters; and
2. Using Company resources, networks or devices to access prediction markets; and
3. Using any non-public, confidential or proprietary information, whether or not material, in any form of speculative activity; and

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4. Assisting any other person in doing any of the things prohibited in items 1 through 3 above.

The prohibitions in this section apply at all times, both during and outside work hours, and regardless of whether any Company property or resources are used.

Research Companies and Expert Interviews

Research companies (examples include Tegus Alpha Sense, Coleman Research Group, Gerson Lehrman Group) pay to conduct interviews with Company employees as industry experts. During interviews the research companies will seek information and comment on the Company, our competitors, our suppliers or the industry in general.

Covered Parties may not participate in any interviews with or provide any information to any research companies or media outlets.

Covered Parties may not assist any person who is not a Covered Party to undertake any of the activities described in this section. The prohibitions in this section apply at all times, both during and outside work hours, and regardless of whether any Company property or resources are used.

Any exception to this prohibition must be prior approved in writing by the Chief Executive Officer.

Confidentiality

Covered Parties should be careful not to divulge information about the Company, even accidentally. Covered Parties regularly come into possession of Confidential Information (as that term is defined below) in the course of the Company's business. The Company is committed to protecting Confidential Information, whether generated within the Company or obtained from some other source. The Company is also strongly committed to avoiding the misuse, or the appearance of misuse, of such information, whether in connection with the trading of securities or otherwise.

In the course of his or her participation in the work of the Company, a Covered Party may obtain or have access to non-public information that might be of use to competitors, or harmful to the Company or our guests, vendors and other parties with whom we do business, if disclosed. Such information may have been or may be provided in written or electronic form or orally. All such information, from whatever source obtained and regardless of the Company's connection to the information, is referred to as "Confidential Information." Confidential

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Information excludes information that has been made generally available to the public. However, information that when viewed in isolation may be publicly known or can be accessed by a member of the public will constitute Confidential Information for these purposes if such information has become proprietary to the Company through the Company's (whether by itself or on its behalf) aggregation or interpretation of such information.

No Covered Parties should disclose any Confidential Information to non-Covered Parties (including to family members that are non-Covered Parties), except when such disclosure is needed to carry out the Company's business and then only when the Covered Party disclosing the information has no reason to believe that the recipient will misuse the information (for example, when such disclosures are authorized as necessary to facilitate negotiations with vendors, suppliers or customers or when such persons are subject to contractual confidentiality restrictions). When such information is disclosed, the recipient must be told that such information may be used only for the business purpose related to its disclosure and that the information must be held in confidence. Covered Parties should disclose Confidential Information to other Covered Parties only in the ordinary course of business, for legitimate business purposes and in the absence of reasons to believe that the information will be misused or improperly disclosed by the recipient. Confidential Information should be appropriately safeguarded and should not be left where it may be seen by persons not entitled to the information or otherwise accessible by persons not entitled to the information, and Confidential Information should not be discussed with any person within the Company under circumstances where it could be overheard.

In addition to other circumstances where it may be applicable, this confidentiality policy must be strictly adhered to in responding to inquiries about the Company that may be made by the press, securities analysts or other members of the financial community. It is important that responses to any such inquiries be made on behalf of the Company by a duly designated officer. Accordingly, Covered Parties should not respond to any such inquiries and should refer all such inquiries to the Company's Chief Financial Officer, the head of investor relations or the CLO or their respective designee.

Notwithstanding the foregoing, and notwithstanding any other confidentiality or non-disclosure agreement (whether in writing or otherwise, including without limitation as part of an employment agreement, separation agreement or similar employment or compensation arrangement) applicable to current or former employees, the Company does not restrict any current or former employee from communicating, cooperating or filing a complaint with any U.S. federal, state or local governmental or law enforcement branch, agency or entity (collectively, a "Governmental Entity") with respect to possible violations of any U.S. federal, state or local law or regulation, or otherwise making disclosures to any Governmental

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Entity, in each case, that are protected under the whistleblower provisions of any such law or regulation, 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 in conflict with the foregoing is hereby deemed amended by the Company to be consistent with the foregoing.

The obligation to protect our proprietary and confidential information continues after employment or other involvement with us ends.

Covered Parties who fail to comply, either in letter or spirit, with these important policies may be subject to disciplinary action, up to and including termination of employment. The Company may pursue appropriate legal action against present or former Covered Parties to enforce these policies.

Personal Information and Communications

We only collect and retain personal information from team members that is required for the effective operation of its business or as required by law. Information will be kept confidentially and released if only to those who have a legitimate need to know or as otherwise required by law.

Information Regarding Business Partners and Guests

The nature of our business gives many Covered Parties access to critical business information about vendors, and personal information about guests. This information must be kept confidential. For addition information regarding this, please reference our Trade Secret and Confidentiality Policy and any applicable confidentiality agreement to which you are subject.

Obtaining Information About Other Organizations

Information about other companies and organizations, including competitors, must be gathered using appropriate methods. Covered Parties should not solicit or knowingly accept confidential data from competitors, or previous team members.

Timely and Truthful Public Disclosure

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In reports and documents filed with or submitted to the SEC and other regulators by the Company, and in other public communications made by the Company, Covered Parties involved in the preparation of such reports and documents (including those who are involved in the preparation of financial or other reports and the information included in such reports and documents) shall make disclosures that are full, fair, accurate, timely and understandable. Where applicable, these Covered Parties shall provide accurate financial and accounting data for inclusion in such disclosures. Covered Parties shall not knowingly falsify information, misrepresent material facts or omit material facts necessary to avoid misleading the Company's independent public auditors or investors. Covered Parties shall never take any action to coerce, manipulate, mislead or fraudulently influence the Company's independent auditors in the performance of their audit or review of the Company's financial statements.

Social Media and External Media

We respect the rights of Covered Parties to use social media. However, because communications by Covered Parties on social media could, negatively impact business or create legal liability, it is necessary for us to provide certain guidelines. We reserve the right to request that Covered Parties remove postings that are in violation of the Code or any of our other policies. Covered Parties also are to refrain from misstating, falsifying, or embellishing any information regarding their position or responsibilities with. The Code will not be interpreted or applied so as to interfere with the rights of Covered Parties to discuss or share information related to their wages, hours, or other terms and conditions of employment. Covered Parties have the right to engage in or refrain from such activities.

Unintended news leaks can cause significant disruption to our business and to our reputation. Covered Parties may not participate in press interviews or share undisclosed information externally, unless you have written approval from our SVP of Marketing. If you are contacted by a member of the media (press, reporter, editor, producer, blogger) or an industry analyst, financial analyst or investor, immediately forward the request to media@cava.com and notify your manager, if applicable. Do not respond to any inquiries even to acknowledge receipt of the message. It is critical that the Company have accurate and consistent communication with the public through the media. For this reason, only designated representatives of the Company are authorized to speak on behalf of the Company. Covered Parties can refer to our Social Media and External Media Policy for additional information.

Information Technology

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All information that is temporarily or permanently stored, transmitted or received with the aid of our computer systems remain our sole and exclusive property. In addition, all data temporarily or permanently received, collected, downloaded, uploaded, copied and/or created on our computer systems, and all data temporarily or permanently received, collected, downloaded, uploaded, copied and/or created on company computers is subject to monitoring by us, is our exclusive property and may not be copied or transmitted to any outside party or used in any manner that violates the Code or our Information Technology Policy.

All software that has been installed on our computer systems may not be used in any manner that violates this policy. For any information regarding this policy, please reference our Information Technology Policy.

Health and Safety

We are committed to providing a safe and healthy workplace, ensuring food safety, and protecting the environment by eliminating all significant recognized hazards in the workplace, and conducting business in an environmentally sound manner based on scientific understanding, guest needs, and local requirements.

These commitments can only be met with the help of our entire workforce. Team members are encouraged to immediately report any conditions that they perceive to be unsafe, unhealthy, or hazardous to the environment.

Compliance with Our Policy

We take compliance with the Code very seriously. All Covered Parties are responsible for compliance with all aspects of the Code. Our commitment to compliance and ethics starts at the top and we expect our leaders not only to follow the Code but to advocate compliance throughout the organization.

Our success depends on your dedication both to the business and to compliance with legal and ethical requirements. Each Covered Party must act with honesty and integrity and take personal responsibility for their actions and compliance with the Code, all other company policies, and the law. We expect the same level of ethical conduct from everyone that represents us. This includes directors, executive leadership, team members, vendors, contractors and other third parties.

If the Audit Committee, CLO or their respective designee determines that the Code has been violated, either directly, by failure to report a violation, or by withholding information related to a violation, the offending person may be

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disciplined for noncompliance with penalties up to and including removal from office or dismissal. Such penalties may include written notices to the individual involved that a violation has been determined, a written letter of reprimand by the Audit Committee, disgorgement, demotion or re-assignment of the individual involved, suspension with or without pay or benefits and termination of employment. Violations of the Code may also constitute violations of law and may result in criminal penalties and civil liabilities for the offending person and the Company. All persons subject to the Code are expected to cooperate in internal investigations of misconduct.

Waivers

Any waiver of the Code for executive officers or directors may be made only by the Board of Directors or a committee of the Board of Directors and will be promptly disclosed as required by law or stock exchange regulation. Any waiver of the Code for team members who are not directors or executive officers may be made by the CLO or his or her designee.

Acknowledgement

At the time the Code is first disseminated, each Covered Party shall be provided a copy of the Code and will be required to review the Code. On an annual basis, each Covered Party shall indicate in writing their understanding and agreement to be bound by its terms with their signature. A copy of the acknowledgement of and agreement to be bound by the Code will be added to their personnel file.

Consequences

The matters addressed in the Code are sufficiently important that any lapse in judgment within the areas covered here, or any behavior or actions determined by us to be violations of the Code may result in discipline, up to and including termination of employment. Covered Parties may be additionally liable and also be subject to criminal prosecution and/or substantial civil money damages.



Additional Questions

For questions about the Code, please contact the People and Culture team through People and Culture Connect at cavahr@cava.com. You may also place a direct call to us at (202) 517-7445.



I have read and understand CAVA's Code of Business Conduct and Ethics (the "Code"). I will adhere in all respects to the ethical standards and other provisions of the Code. I further confirm my understanding that any violation of the Code will subject me to appropriate disciplinary action.

I certify to the Company that I am not in violation of the Code, unless I have noted the violation in a signed statement attached to this acknowledgement.

Electronically Signed By:

Date:
