

SPARTAN STORES, INC.

CODE OF CONDUCT AND BUSINESS ETHICS

Introduction

At Spartan Stores, we believe that ethical conduct requires more than simply complying with the laws, rules and regulations that govern our business. Our effectiveness depends upon personal integrity and trust. All business affairs of the Company are to be conducted in compliance with all applicable laws, rules and regulations and in accordance with the highest standards of honesty, integrity and ethical behavior. This code is applicable to all directors, officers and employees (“associates”) of the Company.

Rules of Conduct

All associates are expected to:

- Act with honesty and integrity, avoiding actual or apparent conflicts of interest between what is in the best interest of the Company and what could result in personal gain.
- Comply with all applicable laws, rules and regulations.
- Act in good faith, responsibly, with due care, competence and diligence, and without misrepresenting material facts or allowing independent judgment to be compromised.
- Provide full, fair, timely and understandable information for use in reports and other documents that the Company files with or submits to the SEC or in other public communications made by the Company.
- Take reasonable measures to assure that transactions are recorded accurately and fairly as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles.
- Take reasonable measures to assure that receipts and expenditures of the Company are made only in accordance with the authorizations of management and directors of the Company, with adequate supporting documentation, and for the purposes described in the supporting documentation.
- Comply with the Company’s disclosure controls and procedures and internal controls over financial reporting.

- Make no false or misleading entries in the Company's books or records for any reason, and no undisclosed or unrecorded account or fund shall be established for any purpose.
- Responsibly use and control assets and resources employed by or entrusted to them.
- Discourage and reject offers of improper personal benefits that may be presented as a result of his or her position with the Company.
- Respect the confidentiality of information acquired in the course of work, except when authorized or legally obligated to disclose confidential information, and not use confidential information acquired in the course of work for personal advantage.
- Proactively promote ethical behavior in the work environment.
- Promptly report all violations of this code.

Reporting Violations

Violations of this code, complaints regarding accounting, internal control or audit matters, or concerns regarding questionable financial or accounting matters should be reported to the director of internal audit. If there is reasonable cause to believe that the director of internal audit is involved in the matter to be reported, the violation may be reported to the chair of the Audit Committee of the Board of Directors. All reports may be made in writing or by telephone using the HonorLine system (877-684-9585) on a confidential and anonymous basis. The Company will periodically post and advise employees of the mailing and electronic mail addresses and telephone number which may be used for this purpose. Copies of all such reports received shall be retained and summaries of such reports will be reported to the Audit Committee at least quarterly.

The Company will not discharge, demote, suspend, threaten, harass, or in any other manner discriminate against any associate in the terms and conditions of his or her employment for any good faith report of any act or omission such person reasonably believes to have been a violation of this code.

Consequences of Violations

The Company expects all associates to honor and abide by this code in all respects. Associates who violate this code will be subject to appropriate discipline, up to and including discharge.

Amendments and Waivers

This code may be amended by the Board of Directors or the Audit Committee of the Board of Directors. Any amendment or modification of the code shall be promptly disclosed. Any waiver of this code for directors or executive officers of the Company must be recommended by the Audit Committee, approved by the Board of Directors and publicly disclosed.

Adopted May 4, 2004