



November 1, 2022

VIA EMAIL

Lynne Fox, International President
Workers United, an SEIU Affiliate
22 South 22nd Street
Philadelphia, PA 19103

RE: Response to Your Letter dated October 18, 2022

Dear Ms. Fox:

This letter responds to your October 18, 2022 letter, which expresses disagreement with my letter sent to you on October 3, 2022. Unfortunately, like so many of the assertions made in your earlier correspondence, your October 18 letter contains statements that are completely untrue. Because the mischaracterizations in your October 18 letter are unsupported and contrary to what has actually occurred, we believe the assertions contained in your letter do not warrant being dignified with a response, and my failure to address particular points should not be interpreted as an indication that Starbucks agrees with them. However, I will take this opportunity to point out two things.

First, what matters in our dealings with one another are the actual facts which will speak for themselves. Your self-serving assertions are transparently intended to create a false narrative that is contradicted by Starbucks' actions and the misconduct of Workers United. Most of these events are well-documented, and we believe Starbucks has complied with all legal obligations that relate to Starbucks stores where Workers United has representation rights or where union organizing has occurred.

Second, the misconduct by Workers United referenced in my October 3, 2022 letter is equally well-documented. Thus, Workers United has continually taken actions that have been responsible for the inability to move forward with bargaining. This misconduct by Workers United representatives has persisted in more recent weeks. Workers United also continues to needlessly impose unlawful unilateral restrictions, limitations and requirements regarding how bargaining must take place, which are now the subject of more than 22 unfair labor practice charges against Workers United that are pending resolution by the National Labor Relations Board.

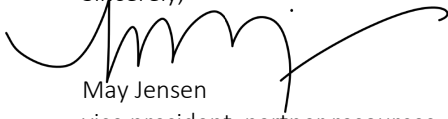
Starbucks created and maintained its successful business by focusing on one store at a time. Although Workers United gave our partners a commitment that their interests would be the subject of negotiations specific to each single store location, Workers United subsequently has done everything it can to disregard the unique interests of Starbucks partners at each individual store. Although you have used different terms at different times (demanding a "first contract" covering all stores, "concurrent" negotiations and/or assembly-line "consecutive" bargaining), your obvious purpose is to avoid making good on the obligation the union assumed by insisting on representation limited to single-store bargaining units.

Because Workers United insisted on obtaining representation at each separate store as a distinct bargaining unit, the law requires both sides to negotiate in good faith for each group of partners, with each store having its own meetings specific to the represented partners who work in that individual store. For our part, we celebrate the diversity that exists among Starbucks partners at each individual store. In each set of negotiations regarding

partners at every single-store location, we look forward to good faith bargaining focusing on interests of those particular partners. We can only hope that Workers United will eventually seek to satisfy the commitment made to Starbucks' partners to represent their interests at their specific stores.

Given that Workers United and Starbucks have now designated their respective representatives for each single-store bargaining unit, those representatives should work together to address details regarding bargaining dates, times, locations, and other logistical issues, and the actual conduct of contract bargaining for each set of negotiations going forward, in person only.

Sincerely,

A handwritten signature in black ink, appearing to read 'May Jensen', with a long, sweeping flourish extending to the right.

May Jensen
vice president, partner resources