

US FOODS HOLDING CORP.
PALM OIL POLICY
Effective Date: April 27, 2026

I. Purpose and Guiding Principles

This Palm Oil Policy (the “Policy”) outlines our minimum requirements for suppliers¹ of US Foods’ Exclusive Brands² products containing palm oil or palm oil derivatives, as well as US Foods’ commitments related to responsible sourcing in the context of palm oil and palm oil derivatives. This Policy is informed by the [Accountability Framework](#) (“AFi”) guidance and uses some of AFi’s relevant definitions³ to define our supplier expectations and requirements.

II. Scope

US Foods does not directly source crude palm oil. However, certain products we source may contain palm oil or palm-oil-derived ingredients as components of finished goods. As such, this Policy is focused on US Foods’ Exclusive Brands products containing palm oil, palm kernel oil, or palm oil derivatives⁴.

This Policy is supplemented by the following US Foods policies and commitments, each with its own defined scope:

- Supplier Code of Conduct ([accessible here](#))
- Human Rights Policy ([accessible here](#))
- Forests Policy ([accessible here](#))

III. Commitments

A. Recognizing the Roundtable on Sustainable Palm Oil (“RSPO”) Standards

US Foods commits to current RSPO standards and enforcement mechanisms and to supporting the strengthening and continuous improvement of these standards by working with the RSPO, our suppliers, and relevant organizations to help advance responsible palm oil sourcing practices.

B. Supporting Practices to Help Minimize the Risk of Deforestation⁵

US Foods commits to supporting practices to help minimize the risk of deforestation associated with the production of palm oil based upon the following principles:

- Compliance with RSPO Principles and Criteria (“P&C”) or other equivalent standard(s);
- Protection of High Conservation Value (“HCV”) and High Carbon Stock forests (“HCS”);
- No new development on peatlands and the use of RSPO Best Management Practices (“BMP”) for existing plantations on peatlands;
- No-burn policies and practices; and

¹ “Supplier” is defined as any person or entity that sells or supplies services, raw materials, processed materials, or finished products directly to US Foods and/or its affiliates or subsidiaries.

² US Foods’ Exclusive Brands products are products sold under US Foods’ brands, while Manufacturer Brands products are other companies’ products that we stock for the convenience of our customers: [Exclusive Brands](#) (last accessed April 27, 2026).

³ <https://accountability-framework.org/use-the-accountability-framework/definitions/> (last accessed April 27, 2026)

⁴ Limited to declared ingredients consistent with USDA ingredient labeling requirements.

⁵ “Deforestation” is defined using the AFi definition as “loss of natural forest as a result of: (i) conversion to agriculture or other non-forest land use; (ii) conversion to a tree plantation; or (iii) severe and sustained degradation.”

- Traceable and transparent palm oil supply chains.

C. Supplier Engagement on Responsibly Sourced Palm Oil

US Foods commits to engaging our Exclusive Brands suppliers to help support the production and sourcing of palm oil and palm oil derivatives in accordance with the RSPO P&C or other equivalent standard(s).

D. Protecting Human Rights

US Foods commitments related to respecting and protecting human rights are set forth in US Foods' Human Rights Policy. Supplier requirements and expectations related to human rights are described in US Foods' Supplier Code of Conduct.

IV. Targets

To help fulfill our commitments related to palm oil sourcing, US Foods has maintained the following target since its initial implementation in 2019:

- Maintain, annually, 100% of the palm oil or palm oil derivatives used in our Exclusive Brands products being certified, at minimum, RSPO Mass Balance⁶, or an equivalent or higher standard. In the case where a supplier can demonstrate that physical supply chains are unavailable, RSPO Credits may be used.

These commitments are subject to quality, regulatory compliance, consumer demand, price, supply chain considerations, and availability. We will provide yearly public reports on our target performance in the US Foods annual sustainability reports ([accessible here](#)) and annual RSPO Annual Communication of Progress ("ACOP") submissions.

V. Implementation

To implement and monitor compliance with this Policy's commitments and target, US Foods also commits to the following implementation practices:

- Engaging directly with in scope suppliers annually to collect and assess information about their No Deforestation, No Peat, No Exploitation ("NDPE") commitments or related policies, their purchased palm oil or palm oil derivative volumes for US Foods Exclusive Brands products in the reporting year, and the certification status of the reported palm volume.
- Engaging directly with in scope suppliers that are identified as non-compliant with this Policy to determine necessary remedial action and timeframe to meet our requirements. If a supplier fails to make satisfactory progress to resolve any identified violations, or refuses to do so, US Foods may terminate its business relationship with the supplier, as outlined in our Supplier Code of Conduct.
- Engaging with the RSPO and other organizations on best practices regarding sustainability, traceability, and transparency related to global palm oil production.
- Providing internal training, communications, and other resources to educate US Foods associates and customers on responsibly sourced palm oil production and our Palm Oil Policy and target.

We also expect US Foods' direct trade suppliers to adhere to US Foods' Supplier Code of Conduct, which outlines our requirements and expectations for suppliers, including how we monitor progress toward and comply with the commitments in this Policy.

⁶ "Mass balance," as defined by AFi, is "a chain of custody model under which product with particular characteristics of interest may be mixed according to defined criteria with material that may lack these characteristics. Materials may be mixed at any stage in the supply chain, provided that the quantities are controlled such that the quantity of product sold as having the given characteristics is equivalent to the quantity of product produced with these characteristics."

VI. Oversight

This Policy has been approved by senior management. Oversight of our sustainability strategy, including reviewing progress against our goals and initiatives, such as the commitments and targets outlined in this Policy, is by the Nominating and Corporate Governance Committee of our Board of Directors.