

US FOODS HOLDING CORP.
RESPONSIBLE SOURCING POLICY AND SUPPLIER CODE
Effective Date: June 29, 2018

I. Purpose and General Principles

This Responsible Sourcing Policy outlines our standards for suppliers and our priorities for selecting, evaluating and monitoring suppliers. The Policy is intended to ensure that suppliers understand our expectations, and US Foods employees understand their responsibility for evaluating suppliers.

The standards in this Policy are informed by the UN Universal Declaration of Human Rights, the International Labor Organization Conventions and Recommendations, UN Guiding Principles on Business and Human Rights, and related internationally recognized standards.

II. Supplier Code of Conduct

This Code sets forth the principles and ethical standards that we expect all our suppliers to meet, and we ask that suppliers train their employees to understand and comply with this Code. Suppliers who knowingly violate laws or repeatedly fail to conform to these principles will not receive our business.

A. Legal Compliance

We expect each supplier to conduct business in full compliance with all applicable national, regional, state and local regulations and laws of the countries in which they operate, including all trade, export and import controls and all applicable antitrust and fair competition laws.

B. Human Rights

We are committed to treating our employees, our customers and our business partners with dignity and respect for human rights as set out in the United Nations Declaration of Human Rights. Each of our suppliers must have controls in place that:

- Prohibit child labor, forced or compulsory labor and human trafficking
- Ensure compliance with applicable wage, hour and benefits laws, including minimum wage, overtime and maximum work week laws
- Verify the employment eligibility of employees
- Respect the right of employees to freely associate, organize and legally bargain collectively
- Ensure a workplace free from discrimination and harassment, especially based on race, color, gender, age, sexual orientation, religion, caste, national origin, ethnicity, marital status, disability, pregnancy or political beliefs.

C. Safe and Healthy Workplace

We require that all workplaces used to produce goods for US Foods be safe and healthy work environments for workers. All working conditions must comply with applicable laws and industry standards, including clean and safe housing.

D. Food Safety, Quality and Regulatory Compliance

We are committed to ensuring our products meet the highest standards of safety and quality. We expect our suppliers to provide products and services that meet or exceed all applicable government and contractual standards of safety and quality. Suppliers must immediately report to US Foods any deficiencies in product safety or quality so that appropriate actions may be taken to recall or withdraw products.

E. Sustainability and Social Responsibility

US Foods strives to be a good corporate citizen, improving the quality of life of our customers and our communities. We focus on these objectives: hunger relief, promoting sustainable products and sourcing, promoting culinary education for underprivileged youth in our communities, and reducing our environmental impact. We seek to conduct business with suppliers who share our commitment to these objectives.

F. Ethical Business Practices

We conduct our business ethically and honestly, and we expect the same of all with whom we do business. Our suppliers must have policies and controls in place to prohibit and detect misuse of company assets, corruption, bribery, conflicts of interest, improper gifts, fraud and embezzlement. Suppliers must respect and abide by US Foods policies prohibiting improper gifts.

G. Confidentiality and Privacy

Suppliers with access to confidential and proprietary information about US Foods must not disclose that information to any other person or entity without our prior written consent. Confidential and proprietary information includes product specifications, cost, pricing, and customer information. Additionally, suppliers must protect from unauthorized disclosure any private information regarding US Foods' customers or US Foods' employees that the supplier may receive, including home addresses, Social Security numbers, birth dates or medical information. Any unauthorized disclosure of confidential or private information related to US Foods, its employees or customers must be reported immediately to US Foods Legal Department or the Check-In Line, 1-888-310-7716.

H. Speaking Up, No Retaliation

We encourage our employees and the employees of our suppliers to speak up if something does not seem right. Supplier employees may report any concerns or suspected violations of this Code to any US Foods manager or to the Check-In Line, 1-888-310-7716, available 24 hours a day, 7 days a week. All reports are confidential and may be provided anonymously where permitted by law. Suppliers must have a "no retaliation" policy that ensures that any employees of the supplier may report concerns to any US Foods employee without fear of retaliation or reprisal by the supplier's management.

III. Upholding Supplier Standards

US Foods seeks to conduct business with suppliers who do business in accordance with the principles articulated in the Supplier Code. We will monitor and enforce this Code through screening tools and audits, as needed, and we require our suppliers to allow us access to their facilities as well as all relevant records. While US Foods would prefer to work with suppliers to correct violations, in some cases, a violation may be serious enough to require immediate action and may result in the termination of the business relationship. Additionally, if a supplier fails to make satisfactory progress toward resolving violations or refuses to do so, US Foods shall terminate its business

relationship with the supplier. Suppliers must inform US Foods immediately of any departure from this Code including regulatory compliance failures or other events that may put our customers at risk or cause damage to our reputation.

US Foods trains its employees who interact with suppliers to ensure familiarity with the Responsible Sourcing Policy and Supplier Code and required actions to ensure supplier compliance.

IV. Category Standards

As US Foods continues to develop our Responsible Sourcing strategy and capabilities, we will focus on categories that further our objectives. To date, we have set additional standards in the following categories:

A. Seafood

In addition to the general standards for suppliers listed above, US Foods is working to continually improve the sustainability and traceability of our seafood supply chain beginning with a focus on our exclusive brand seafood products. This [Responsibly Sourced Seafood policy](#) is incorporated into this policy and focuses on data collection, transparency, education and best practices for fisheries and aquaculture.

B. Products Including Palm Oil

To address potential environmental and social risks associated with palm oil production, US Foods has adopted a policy on [Responsibly Sourced Palm Oil](#) that is incorporated into this policy and focuses on key principles and commitments.

V. Serve Good Product Standards

As US Foods strives to become a leader in responsible sourcing, we have introduced [Serve Good](#), a line of products that are responsibly sourced or contribute to waste reduction. This program is incorporated into this policy.