

US FOODS HOLDING CORP.
RESPONSIBLY SOURCED SEAFOOD POLICY
Effective Date: June 29, 2018

I. Purpose and General Principles

As the global demand for seafood continues to grow, we understand distributors play a critical role in supporting the long-term health of fisheries and aquaculture. At US Foods, we are working to continually improve the sustainability and traceability of our seafood supply chain, starting with a focus on our Exclusive Brand seafood products.

II. Applicability

The scope of this document is focused on US Foods' Exclusive Brand seafood products. As we continue to build our strategy, we will consider Manufacturer Brand products as appropriate.

All Exclusive Brand suppliers are required to adhere to our Exclusive Brand Supplier & Co-Packer Food Safety & Quality Systems Manual, and our Supplier Code of Conduct. These include specific standards for all suppliers producing goods for US Foods pertaining to food safety, quality and regulatory compliance; human rights; a safe and healthy workplace; and ethical business practices.

III. Principles and Standards

A. Exclusive Brand Products

As responsibly sourced seafood practices continue to vary across countries and organizations, US Foods is working to make seafood choices easier and more transparent for our customers.

Our commitments address all species within our Exclusive Brands seafood portfolio and each stage of our supply chain. In addition, this policy leverages our partnerships with best-in-class industry organizations at the forefront of seafood sustainability standards.

For our Exclusive Brand products, we have 3 tiers of products:

Tier 1 - Serve Good®: Certified sustainable with chain of custody. Meets strict Serve Good packaging standards.

- Wild Caught Species will carry a Marine Stewardship Council (MSC) and MSC Chain of Custody certification; or
- Farmed Species will carry a Best Aquaculture Practices (BAP) 4 star, or have the highest level of BAP available for the species; or
- Equivalent Global Sustainable Seafood Initiative (GSSI) benchmarked certifications where US Foods has the associated chain of custody certification, will be considered.
- All Serve Good products meet the standards described in the [Serve Good Packaging Policy](#), which requires criteria for minimum use of post-consumer recycled content, responsibly-managed forestry certifications and reducing waste.

Tier 2 - Progress Check™: Partial certification. Making significant progress towards meeting Tier 1 standards.

- Wild Caught Species:
 - GSSI benchmarked certification where US foods does not have an associated chain of custody certification; or
 - Fishery Improvement Project rated, "A, B or C" by FishSource of Sustainable Fisheries Partnership (SFP); or
 - Low risk as advised by FishSource of SFP

- Farmed Species:
 - BAP 1 Star, 2 Star or 3 Star recognition; or
 - Aquaculture Stewardship Council (ASC) Certified without associated ASC Chain of Custody certification; or
 - GSSI benchmarked certification where US Foods does not have an associated chain of custody certification; or
 - Participant in the Aquaculture Improvement Project (AIP); or
 - Equivalent certification or improvement projects will also be considered

Tier 3 - Conventional Products: US Foods is currently engaging vendors in identifying opportunities toward meeting Progress Check and Serve Good standards.

- For species with sources that do not yet meet the criteria for Serve Good or Progress Check, US Foods will collaborate with vendors and encourage deeper engagement with partners like SFP and the National Fisheries Institute, fisherman, fish farmers, and other external stakeholders to help evaluate immediate opportunities toward meeting the criteria for Serve Good or Progress Check standards.

B. Collection of Data

We partner with SFP to gather and review source fishery data collected from our suppliers including species, country of origin and region of harvest, fishing gear type and sustainability certifications or improvement projects. This information is analyzed against the FishSource™ database to review the management of the fishery, the health of the fish stocks, and the impacts of the fishing gear on other wildlife or the environment. This summary of environmental performance associated with the sources of our seafood products allows us to identify areas where we can make the biggest impact for continuous improvement and responsible sourcing.

US Foods is committed to implementing systems and practices to collect data on the sourcing of our seafood back to the harvest location or farm to ensure legality and to eliminate unreported and unregulated seafood from our product line.

C. Milestones and Targets

Subject to quality, regulatory compliance, consumer demand, price, supply chain considerations and availability, we commit to:

1. By end of year 2018, 80% of the Harbor Banks seafood portfolio, US Foods largest portfolio of Exclusive Brand seafood products, will meet either Progress Check or Serve Good standards.
2. By end of year 2020, 100% of the Harbor Banks seafood portfolio will meet either Progress Check or Serve Good standards.
3. By end of year 2019, we will publish an action plan for all other Exclusive Brand seafood products.
 - a. Shelf-stable tuna will be included in our action plan as we strive to source tuna in line with our Progress Check and Serve Good criteria

We will report annually on progress toward our specific commitments.

D. Education of Employees, Customers, and Vendors

We will dedicate appropriate resources to reinforce our responsibly sourced seafood commitments with employees, customers and vendors:

- We will highlight our policy on our US Foods Corporate Citizenship webpage and educate customers through sales and marketing materials.
- We will continue to leverage training sessions and internal communications to educate our employees on our responsibly sourced seafood policy.

- We will actively engage and collaborate with vendors to continuously improve our responsibly sourced seafood policy and promote opportunities toward certified practices.
- We will continue to leverage the partnerships we have built with leading sustainable seafood organizations to inform the implementation of best practices promoting traceability and transparency.