

**US FOODS® HOLDING CORP.**  
**FORESTS POLICY**  
**Effective Date: November 10, 2025**

## **I. Purpose and Guiding Principles**

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This Forests Policy (the “Policy”) outlines our commitments and risk-based approach to addressing deforestation and ecosystem conversion across our Exclusive Brands<sup>1</sup> sourcing. This Policy is informed by the [Accountability Framework](#) (“AFi”<sup>2</sup>) guidance and uses some of its relevant definitions<sup>3</sup> to define our commitments and promote alignment in related sustainability practices across industries and organizations. These include, among others, the AFi’s definitions for deforestation<sup>3</sup> and conversion<sup>4</sup>.

## **II. Scope**

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Applying a risk-based approach, we are focused on commodities identified as potentially posing non-low-risk to deforestation and/or ecosystem conversion within our Exclusive Brands products sourcing.

The scope of this Policy includes:

- All commodities that US Foods sources for its Exclusive Brands products portfolio, including as an ingredient and/or as a finished product, that have been identified<sup>5</sup> to potentially pose a non-low-risk for deforestation or ecosystem conversion;
- All US Foods direct operations and Exclusive Brands products, unless otherwise specified;
- All US Foods Exclusive Brands suppliers<sup>6</sup>, unless otherwise specified.

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](#))
- Responsibly Sourced Palm Oil Policy ([accessible here](#))

## **III. Commitments**

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### **A. Reducing the Risk of Deforestation and Ecosystem Conversion**

US Foods recognizes the protection of forests and other natural ecosystems as critical for helping to address climate change and maintain biodiversity and therefore commits to reducing the risk of deforestation and ecosystem conversion<sup>7</sup> across our Exclusive Brands sourcing activities using a risk-based approach, as defined in the Policy scope. This commitment includes:

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<sup>1</sup> US Foods’ Exclusive Brands products are US Foods’ own-branded products, while Manufacturer Brands products are other companies’ products that we stock for the convenience of our customers.

<sup>2</sup> <https://accountability-framework.org/use-the-accountability-framework/definitions/> (last accessed 11/10/2025)

<sup>3</sup> “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.”

<sup>4</sup> “Conversion” is defined using the AFi definition as “loss of a natural ecosystem as a result of its replacement with agriculture or another land use, or due to a profound and sustained change in a natural ecosystem’s species composition, structure, or function.”

<sup>5</sup> Commodities are identified as non-low-risk using the Science Based Targets Network methodology.

<sup>6</sup> “Supplier” is defined as any person or entity that sells or supplies services, raw materials, processed materials, or finished products to US Foods and/or its affiliates or subsidiaries.

- Reducing the risk of deforestation of natural forests, including High Carbon Stock (“HCS”) forests<sup>8</sup>;
- Reducing the risk of conversion of mangroves or peatlands of any depth;
- Protecting natural forests<sup>9</sup> and natural ecosystems<sup>10</sup> within our direct operations.

## **B. Stakeholder Engagement**

US Foods commits to active and meaningful stakeholder engagement, including by participating in multi-stakeholder forums to advance shared goals related to our commitment to reducing the risk of deforestation and ecosystem conversion in our Exclusive Brands products sourcing.

## **C. Protecting Human Rights**

US Foods commitments related to respecting and protecting human rights are set forth in US Foods’ Human Rights Policy ([accessible here](#)). Supplier requirements and expectations related to human rights are described in US Foods’ Supplier Code of Conduct ([accessible here](#)).

## **IV. Targets**

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To fulfill our commitment to reducing the risk of deforestation and ecosystem conversion across our Exclusive Brands supply chain, US Foods has set the following targets:

- Complete supply chain mapping<sup>11</sup> and risk assessment at the production or processing units of origin-level (to the extent that information is available) for our Exclusive Brands products identified<sup>12</sup> as high- and medium-forest-risk commodities.
- Provide yearly public reports on supply chain mapping and risk assessment activities for our Exclusive Brands products that use high- and medium-forest-risk commodities, as well as any resulting targets and/or interventions, in the Company’s annual sustainability report ([accessible here](#)).
- Complete a third-party-led deforestation and ecosystem conversion risk assessment for all our Exclusive Brands products no less frequently than every 5 years.

In keeping with our risk-based approach, US Foods may set additional commodity-specific targets for Exclusive Brands products and will revise this Policy as necessary to include such targets. Current commodity-specific targets include:

- 100% of the palm and palm kernel oil used in all Exclusive Brands products be certified, at minimum, Roundtable on Sustainable Palm Oil (RSPO) Mass Balance in accordance with US Foods’ Responsibly Sourced Palm Oil Policy ([accessible here](#)).

## **V. Implementation and Oversight**

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

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<sup>8</sup> HCS forests should be identified using the High Carbon Stock Approach or other recognized and credible methodology: <https://highcarbonstock.org/> (last accessed 11/10/2025).

<sup>9</sup> “Natural forests” is defined using the AFi definition as “a forest that is a natural ecosystem.”

<sup>10</sup> “Natural ecosystems” is defined using the AFi definition as “an ecosystem that substantially resembles — in terms of species composition, structure, and ecological function — one that is or would be found in a given area in the absence of major human impacts. This includes human-managed ecosystems where much of the natural species’ composition, structure, and ecological function are present.”

<sup>11</sup> “Supply chain mapping” is defined using the AFi definition as the “process of identifying the actors in a company’s supply chain and the relationships among them.”

<sup>12</sup> Identified based on a third party-led deforestation and land conversion risk assessment of Exclusive Brands products completed in 2023.

- Working with suppliers to address, mitigate, and, where necessary, remedy environmental and social harms that violate this Policy;
- Partnering, as applicable, with trade, industry, and other organizations to increase the effectiveness of our actions related to this Policy and to help advance our commitment to reducing the risk of deforestation and ecosystem conversion in our Exclusive Brands product supply chain.

We also expect the Company's 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.

This Policy has been approved by senior management. Oversight of our sustainability strategy and program, 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. Additionally, the Audit Committee of our Board of Directors oversees ethics and compliance matters, including the handling of grievances.