

PROHIBITION AGAINST DISCRIMINATION, HARASSMENT, AND RETALIATION

The Company prohibits discrimination and harassment of any kind and any associate who engages in such conduct toward another associate will face discipline, up to and including termination.

Harassment includes inappropriate conduct based on any protected status, including: race, color, religion, sex, gender, sexual orientation, pregnancy, status as a parent, age, marital status, national origin, ancestry, citizenship status, physical or mental disability, medical condition, genetic information, political beliefs, military or veteran status, or any other characteristic protected by law.

For purposes of this policy, gender includes gender identity or expression, transgender identity, pregnancy, childbirth or related medical condition, and gender stereotyping. The Company is committed to providing a work environment that is free of unlawful discrimination, including harassment that is based on any legally protected status. US Foods will not tolerate any form of harassment that violates this policy.

The Company also prohibits threats and bullying, and unprofessional or discourteous actions designed or intended to harm other associates. Any inappropriate remarks, slurs, jokes or other comments will not be tolerated.

Sexual harassment or discrimination or similar inappropriate behavior may also violate applicable local law. US Foods prohibits such conduct regardless of whether it rises to the level of a legal violation.

You need to use good judgment and never make inappropriate or harassing comments that violate this policy. This is true whether or not the use of the inappropriate remark, joke or slur is meant to be a joke or is not meant to be offensive.

This policy applies to everyone working at or with the Company. This policy and the law forbid any associate, manager, supervisor, officer, director, client, vendor, or any third party that an associate encounters in connection with Company business, to harass, discriminate, or retaliate against any Company associate, applicant, contractor, intern, or volunteer, on the basis of any legally protected status or activity, including via electronic or other communication media.

Inappropriate behavior will not be tolerated at Company locations or in any other settings, including business trips or social events. This policy also

prohibits offensive conduct that does not rise to the violation of law, as explained below.

Forms of Inappropriate Conduct

Some examples of conduct prohibited under this policy include:

- Sexual innuendos, and racial or sexual epithets, slurs, off-color jokes, propositions, suggestive or insulting sounds
- Sexually suggestive messages, posters or drawings, whether electronic or in person
- Sexually suggestive objects or pictures, graphic commentaries, inappropriate staring or leering, or obscene gestures
- Unwanted physical contact of any kind, including unwanted touching or hugging, interference with any individual's normal work movement, or assault
- Threatening or carrying out retaliation as a result of a negative response to harassment

US Foods prohibits this conduct in the workplace, even if the conduct is not sufficiently severe or pervasive to constitute unlawful harassment.

Sexual Harassment

Sexual harassment is a problem that deserves special mention. Harassing conduct based on gender often is sexual in nature but sometimes is not. This policy forbids harassment based on gender regardless of whether the offensive conduct is sexual in nature. Any unwelcome conduct based on gender is also forbidden by this policy regardless of whether the individual engaged in harassment and the individual being harassed are of the same or are of different genders.

According to the U.S. Equal Employment Opportunity Commission (“EEOC”), unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct based on sex constitute unlawful sexual harassment when:

- There is an implicit or explicit understanding that submission to the conduct is a condition of the individual’s employment
- Submission to or rejection of the conduct is the basis for an employment decision
- The harassment interferes with the individual’s work performance or creates an environment that is intimidating, hostile or offensive

This policy forbids harassment based on gender regardless of whether it rises to the level of a legal violation. Examples of gender-based harassment forbidden by this policy include (1) offensive sex-oriented verbal kidding, teasing or jokes; (2) repeated unwanted sexual flirtations, advances or propositions; (3) verbal abuse of a sexual nature; (4) graphic or degrading comments about an individual’s appearance or sexual activity; (5) offensive visual conduct, including leering, making sexual gestures, the display of offensive sexually suggestive objects or pictures, cartoons or posters; (6) unwelcome pressure for sexual activity; (7) offensively suggestive or obscene letters, notes or invitations; (8) offensive physical contact such as patting, grabbing, pinching, or brushing against another’s body; or (9) sexual favoritism.

Report the Behavior

If you know about conduct that is inconsistent with this policy, you need to report it right away. US Foods has an Open Door Policy, and there are a few ways you can report the issue, which may include the following:

- Talk to your supervisor
- Contact the toll-free Check-In Line at 1-888-310-7716 or www.usfoodcheckinline.com
- Contact your local Human Resources Representative
- Notify the Chief Human Resources Officer in the Corporate Office at: US Foods, 9399 W. Higgins Road, Suite 500, Rosemont, Illinois 60018

If you don’t feel comfortable talking about it with your manager, you don’t have to do so. There are other people available to you. Talk to your local Human Resources Representative, the next-level supervisor, or your Location Manager.

If for any reason you don’t feel you can talk to these people about the problem, contact the toll-free “Check-In Line” at 1-888-310-7716 or www.usfoodcheckinline.com. Your report will be confidential, which means that neither the third party that receives your call nor US Foods will seek to identify you. If you choose this option, you may provide a contact option that does not identify you to ensure that the Company can contact you if the Company has further questions. We’re committed to preventing discrimination, harassment, and retaliation, but we can only do that if you report issues when they come up. Everyone, no matter their role, is required to report harassment or other behavior that is inconsistent with this policy.

Any manager or supervisor who is aware of conduct inconsistent with the policy or who receives a report of conduct inconsistent with the policy must report it immediately to his or her local Human Resources Representative unless it is more appropriate to report the concern in one of the other ways described above.

This policy includes inappropriate conduct by a third party, including contractors and vendors.

Investigation of Complaints

The Company will investigate complaints swiftly and effectively, and take steps to prevent issues in the future. To that end, both the reporting party and the party who allegedly violated this policy will be offered an opportunity to be interviewed or to otherwise respond. While we will always try to keep the complaint confidential, we do have the right to inform people involved in the investigation on a need-to-know basis, and under certain limited circumstances, may have to disclose information to third parties.

If an investigation reveals that a violation of this policy or other inappropriate conduct has occurred, then US Foods will take corrective action, including discipline up to and including termination, reassignment, changes in reporting relationships, training, or other measures the Company deems appropriate under the circumstances, regardless of the job positions of those involved. The Company may take corrective action for any conduct that violates Company policy and is discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law or even a violation of this policy. If the person who engaged in prohibited conduct is not employed by the Company, then the Company will take whatever corrective action is reasonable and appropriate under the circumstances.

Non-Retaliation

US Foods forbids that any associate treat any other associate or former associate or applicant adversely for reporting discrimination and/or harassment, for assisting another associate or applicant in making a report, for cooperating in a discrimination and/or harassment investigation, or for filing an administrative claim with the EEOC or a state governmental agency. Nothing in this policy, however, prevents the Company from taking action against an associate who raises a concern in bad faith.

If you engage in retaliation, you will face discipline, including termination. All associates who experience or witness any conduct they believe to be retaliatory should immediately follow the reporting procedures stated above.

Filing an External Complaint

If you feel you have been subjected to harassment, discrimination or retaliation, while you are encouraged to raise an internal complaint, you always may file a complaint with your state's respective civil rights agency and/or the EEOC. State and federal laws require that complaints/charges be filed within a certain amount of days from alleged incidents of discrimination, harassment or retaliation. Places where you may find information that explains these requirements and other related information, such as detailed filing instructions, include state-managed websites. Some states require that state agency contact information be listed in this policy, and that information (as well as contact information for the EEOC in those states) is set forth below.

Illinois	Office Locations			Complaint Deadline
Illinois Department of Human Rights	Chicago: 100 West Randolph Street, 10th Floor, Intake Unit, Chicago, IL 60601 312-814-6200 or 800-662-3942 TTY: 866-740-3953	Springfield: 222 South College, Room 101-A, Intake Unit, Springfield, IL 62704 217-785-5100/TTY: 866-740-3953	Marion: 2309 West Main Street, Marion, IL 62959 618-993-7463/TTY: 866-740-3953	180 days from alleged incident
Illinois Human Rights Commission	Chicago: 100 W. Randolph Street, Suite 5-100, Chicago, Illinois 60601 312-814-6269 / TTY: 312-814-4760	Springfield: William G. Stratton Office Building, Suite 802, Springfield, Illinois 62706 217-785-4350 / TTY: 217-557-1500		180 days from alleged incident
Equal Employment Opportunity Commission	500 West Madison Street, Suite 2000, Chicago, Illinois 60661 800-669-4000 / TTY: 800-869-8001			300 days from the alleged incident
Maine	Office Locations			Complaint Deadline
Maine Human Rights Commission	51 State House Station, Augusta, Maine 04333-0051 207-624-6050 / TTY: 207-624-6064			300 days from the alleged incident
Equal Employment Opportunity Commission	John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203 1-800-669-4000 / TTY: 1-800-669-6820			300 days from the alleged incident
Massachusetts	Office Locations			Complaint Deadline
Massachusetts Commission Against Discrimination	Boston: One Ashburton Place, Rm. 601, Boston, MA 02108 617-994-6000 (voice/TDD)	Springfield: 424 Dwight Street, Rm. 220, Springfield, MA 01103 413-739-2145 (voice/TDD)		300 days from the alleged incident
Equal Employment Opportunity Commission	John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203 1-800-669-4000 / TTY: 1-800-669-6820			300 days from the alleged incident
Vermont	Office Locations			Complaint Deadline
Vermont Attorney General's Office, Civil Rights Unit	109 State Street, Montpelier, VT 05609 802-828- 3171 (voice/TDD)			300 days from the alleged incident
Equal Employment Opportunity Commission	John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203 1-800-669-4000 / TTY: 1-800-669-6820			300 days from the alleged incident
Rhode Island	Office Locations			Complaint Deadline
Rhode Island Commission for Human Rights	180 Westminster Street, 3rd Floor, Providence, RI 02903 401-222-2661 / TTY: 401-222-2664			365 days from the alleged incident
Equal Employment Opportunity Commission	John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203 1-800-669-4000 / TTY: 1-800-669-6820			300 days from the alleged incident