

**US FOODS HOLDING CORP.**  
**US Foods Electronic Social Networking Policy**  
**Effective Date: June 30, 2020**

**I. Purpose and General Principles**

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This US Foods Electronic Social Networking Policy (this “Policy”) establishes principles for the appropriate access and use by US Foods employees, authorized agents, and representatives in “electronic social networking” activities. This Policy supplements the Electronic Communications Policy, Acceptable Use Policy, the Cell Phones and Personal Electronic Devices Policy, the Code of Conduct, and the Logo and Brand Use Guidelines. Violating any of these policies may result in the revocation of access to technology resources, as well as disciplinary action up to and including termination of employment. These actions are subject to the procedural requirements as determined by the laws and rules of the states in which we operate.

**II. Applicability**

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This Policy applies to all associates, authorized agents, and representatives of US Foods, including any person or entity acting for or on behalf of US Foods, whether operating inside or outside the United States. This Policy also applies to all employees, authorized agents and representatives of, and any other person or entity acting for or on behalf of, any US Foods entities, subsidiaries, affiliates or joint ventures in which US Foods holds a controlling interest.

**III. Definitions**

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**Electronic Social Networking**

Electronic social networking generally refers to the use of the Internet, cellular, or other networks to share or discuss user-generated information. Examples of such networks include, but are not limited to, blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, personal websites or webpages; listservs or mailing lists; social networking sites; audio or video-sharing websites; internal social intranets or networks, mobile devices; and virtual worlds. This Policy applies to these activities as well as other kinds of social media or user-generated media that is currently available or may become available after the publication of this Policy.

**IV. No Expectation of Privacy**

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As set forth in the Electronic Communications Policy and the Acceptable Use Policy, you should have no expectation of privacy regarding any use of US Foods technology resources, which are subject to monitoring with or without notice, subject to the procedural requirements as determined by the laws and rules of the states in which we operate. As explained further below, regarding Electronic Social Networking, many activities are uniquely public and may be accessible by anyone.

Your personal social networking activities must be consistent with US Foods’ Code of Conduct and policies when using either US Foods equipment or personal equipment

because of the likelihood that such activity will be viewed by co-workers, clients and other stakeholders. Even activities conducted on personal time using personal equipment, if they would be considered unacceptable under our Code of Conduct, this Policy or other policies, can potentially lead to discipline, up to and including termination of employment, under this Policy.

## V. Appropriate Use – General Principles

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US Foods respects its associates' rights to their own opinions and views expressed away from work, and US Foods does not monitor associates' internet or social media activity. We understand that social media serves as a way to share your life, interests, and opinions with family, friends and colleagues.

The use of social media also presents some risks and carries with it responsibilities. Associates should not expect privacy online. Internet or social media posts intended for a small audience may become public and may be broadly distributed without associates' knowledge and consent. Associates should be aware that it is surprisingly easy to identify your employer on the internet. It is not safe to assume that, just because you do not say you work for the company, people will not find out you work for US Foods. And the reality is that associates' internet or social media activity away from work can reflect on US Foods and can impact your ability to live up to our cultural beliefs and leadership behaviors.

Accordingly, associates who post on the internet or social media are subject to US Foods' Code of Conduct, Associate Handbook, and our Prohibition Against Discrimination, Harassment and Retaliation and Workplace Violence Prevention policies. Specifically, associates should avoid malicious, violent, obscene, threatening, harassing, or hateful language, and should not disparage US Foods, its associates, its products, its suppliers or its customers. Violation of these standards may lead to discipline, up to and including termination, depending on the circumstances.

US Foods managers and supervisors should know they are held to a higher standard because their internet and social media posts can impact their ability to be an effective, inclusive leader, consistent with US Foods' cultural beliefs and leadership behaviors.

When using social media, you may not disclose US Foods' proprietary, trade secret, intellectual property, or confidential business information related to the company or its customers, including nonpublic financial information such as future business performance, US Foods' management strategy, business services, or potential mergers or acquisitions, that have not been made public. Furthermore, confidential information relating to US Foods' customers and partners must not be disclosed in social media. Without limitation of the foregoing, you may not reference or cite company customers, clients, vendors, partners, business associates or owners without first obtaining their express written consent.

You should respect all copyrights and trademarks and may not distribute or incorporate any material (including text) retrieved or copied from another website or publication without permission. In certain circumstances the use of copyright and trademark material, such as logos, images, or contents from US Foods or another website or publication can be reproduced with the approval and authorization from US Foods' Corporate Communications.

If you are discussing the US Foods' products or services online, you must disclose your affiliation with US Foods, but may not do so in a way that suggests you are speaking on behalf of US Foods unless you have the authority or permission to do so from Corporate

Communications. When there is a potential for confusion or misattribution, you should prominently post a disclaimer stating that you are expressing only a personal opinion, which has not been reviewed by, or endorsed by, US Foods (for example: “the postings/comments on this site are my own and don’t necessarily represent US Foods’ positions, strategies or opinions”). In any event, you should never use US Foods’ name as part of your online identity (e.g., your username, screen name, or handle).

Accessing social networking sites during work hours and/or when using US Foods’ equipment should be primarily for business purposes and should not interfere with your job duties. Excessive personal use of these tools during working hours may result in actions to reduce non-work-related social media usage and may be considered in the performance appraisal process. In some cases, such behavior may result in discipline, as appropriate.

You should be mindful that even activity that does not lead to disciplinary action can nonetheless create a client or work situation that is harmful to US Foods’ business or reputation, or detrimental to your business reputation or marketability. US Foods reserves the right to retain information gathered on internet usage and will comply with retention schedules in the states in which we operate.

US Foods may block access to certain social networking sites, or provide only limited access for business purposes, as circumstances warrant. In addition, US Foods reserves the right to review and remove comments from US Foods sponsored social media that are deemed inappropriate or are in violation of the Code of Conduct, this Policy or other policies.

You are also legally responsible for your commentary. Participating in any type of Electronic Social Networking is at your risk; you can be held personally liable for commentary deemed to be legally defamatory, obscene, proprietary, or libelous, whether pertaining to US Foods, individuals, or any other company. You participate in online discourse at your own risk, as outside parties can pursue legal action for inappropriate commentary.

If a member of the media contacts you about a US Foods-related posting or requests US Foods information of any kind, contact US Foods’ Corporate Communications department and do not respond to such media member without first receiving the permission to do so from Corporate Communications.

Where no general principle exists, you should use your professional judgment and take the most prudent action possible.

Nothing in this policy prohibits employees from engaging in any activity that is protected under applicable law, including but not limited to, Section 7 of the National Labor Relations Act.

### **Appropriate Use of Social Networking in Recruiting**

US Foods makes use of social networking to drive brand awareness and direct sourcing of employees. This may include professional sites such as LinkedIn, or sites such as Twitter, Facebook, YouTube, Reddit, Digg or others. The use of or reference to social media in the recruiting process should be coordinated by Talent Acquisition.

Other US Foods employees involved in the interviewing or hiring process should discuss in advance with Talent Acquisition any plans to access or attempt to research candidates through social networking -- or to engage a third party to do so on their behalf.

You may not provide US Foods-related employment references. You must adhere to the reference checking policies and procedures applicable to your location. You may provide a personal recommendation on a social networking site (e.g., LinkedIn) if you avoid any direct reference to US Foods.

## VI. Policy Sanctions

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Breaches of this policy can damage US Foods' good reputation and may result in civil and/or criminal exposure for US Foods and company personnel. Accordingly, breaches of this policy may be addressed with discipline up to and including termination of employment, subject to the procedural requirements as determined by the laws and rules of the states in which we operate.

## VII. Related Information

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<b>Related Policies:</b>	Code of Conduct, Acceptable Use of Information Policy, Workplace Violence Prevention Policy, Professional Conduct and Prohibition Against Inappropriate Conduct policy
<b>Related Procedures:</b>	
<b>Related Standards:</b>	

## VIII. Appendix

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The US Foods Check-In Line can assist employees with finding advice and answers to questions about policies, laws and the right course of action by referring your inquiry to the right person or resource. The Check-In Line is a way to report in good faith possible violations of law, regulations or US Foods' policies. Those who contact the Check-In Line can remain anonymous if they choose. There will be no retaliation against anyone who raises questions or concerns under this policy, or any of US Foods' compliance policies.

- Corporate Communications SharePoint Site
- Employees may contact the Legal or Compliance Department at [Compliance@usfoods.com](mailto:Compliance@usfoods.com)
- Contact the US Foods Check-In Line at 1-888-310-7716 or <https://www.usfoodcheckinline.com>.