

US FOODS® HOLDING CORP.
HUMAN RIGHTS POLICY
Effective Date: November 21, 2025

I. Purpose and Guiding Principles

US Foods is committed to operating with integrity under our Code of Conduct ([accessible here](#)). This Human Rights Policy (the “Policy”) outlines our commitments related to protecting and respecting human rights.

This Policy is informed by the principles set forth by the United Nations (“UN”) Universal Declaration of Human Rights (“UNDHR”), the UN Guiding Principles on Business and Human Rights (“UNGPs”), the UN Global Compact, the International Bill on Human Rights, and the International Labor Organization (“ILO”) fundamental conventions (collectively, the “Guiding Principles”). This Policy is informed by the [Accountability Framework](#) (“AFi”) guidance and uses some of its relevant definitions¹ to define our commitments and promote alignment in related human rights practices across industries and organizations.

II. Scope

This Policy applies to US Foods’ associates² and directors.

Human rights-related expectations and requirements for our suppliers³ are described in US Foods’ Supplier Code of Conduct ([accessible here](#)). As stated in our Supplier Code of Conduct, which is made available to suppliers via the Company’s website and a supplier portal, we expect our suppliers to adopt human rights principles comparable to the US Foods Guiding Principles described in this Policy.

III. Commitments

A. Child Labor

US Foods will not employ anyone under the minimum employment age established by the applicable local jurisdiction and will adhere to all applicable working hours and compulsory education laws and regulations for employees under the age of 18.

B. Forced or Compulsory Labor and Human Trafficking

US Foods will not allow prison, slave, bonded, indentured, or any other form of forced labor in our own operations and will not engage in any other form of compulsory labor, such as human trafficking. We forbid abuse, threats, or improper practices, such as retention of associates’ passports or immigration papers in an unlawful manner. We will verify the employment eligibility of associates.

C. Responsible Recruitment

US Foods will comply with all applicable recruitment laws and regulations.

¹ <https://accountability-framework.org/use-the-accountability-framework/definitions/> (last accessed 10/7/202)

² “Associate” is defined as any person who is directly employed by US Foods and includes full-time, part-time, and temporary employees.

³ “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.

D. Working Hours and Minimum Wage

US Foods will comply with all applicable wage, hours, and benefits laws, including those related to minimum wage, working hours, rest periods, and overtime work and pay. We adhere to US Foods' Pay for All Time Worked Policy ([accessible here](#)).

E. Freedom of Association and Collective Bargaining

US Foods respects our associates' right to choose to associate, or not to associate, with third-party organizations, such as labor organizations, as well as the right to bargain collectively in accordance with applicable laws. We encourage open communication between associates and managers and the sharing of ideas, suggestions, or concerns, including through use of our grievance mechanism, described in Section IV of this Policy.

F. Diversity, Nondiscrimination, and Harassment Prohibition

US Foods is an equal opportunity employer and prohibits unlawful discrimination against applicants for employment and associates, as described in US Foods' Equal Employment and Affirmative Action Policy ([accessible here](#)). We prohibit harassment under our Prohibition Against Discrimination, Harassment, and Retaliation Policy ([accessible here](#)), and especially based on race, gender, gender identity, age, sexual orientation, religion, caste, national origin, ethnicity, marital status, disability, pregnancy, dependents, or political beliefs and whether such actions occur at a US Foods location or any other setting, including any such actions by suppliers, customers, or other third parties that our associates encounter in connection with Company business.

G. Disciplinary Measures

We prohibit abusive practices and undue disciplinary measures⁴ in accordance with SA8000 Standard: Universal Declaration on Human Rights.

H. Health and Safety

US Foods commits to providing a safe and healthy workplace⁵ for the protection and well-being of our associates, including by requiring associates to adhere to US Foods' Drug and Alcohol Free Workplace Policy ([accessible here](#)) and our Workplace Violence Prevention Policy ([accessible here](#)). We implement appropriate health and safety practices for our operations and comply with workplace safety laws and regulations. Additionally, our holistic benefits program promotes physical, mental, social, and financial well-being and we offer a variety of well-being initiatives, including health and wellness fairs, along with resources for managing issues such as stress, depression, and sleep.

IV. Reporting Concerns

Stakeholders, including our associates, suppliers, the workers of our suppliers, community members, whistleblowers, and others, can report concerns, complaints, grievances, or suspected violations of this Policy to any US Foods manager, any member of the US Foods Human Resources team, Legal team, or Ethics and Compliance team, or to the US Foods Check-in Line, 1-888-310-7716, available 24 hours a day, seven days a week, online at usfoodscheckinline.com, or by emailing compliance@usfoods.com, with translation services available if needed. Reports can be provided anonymously, and US Foods forbids retaliation for good faith reports. This mechanism for reporting concerns is informed by the UNGPs Effectiveness Criteria.

⁴ "Abusive practices and undue disciplinary measures" are defined using the AFi definition as "the use of corporal punishment, mental or physical coercion, or verbal abuse of personnel, or other harsh or inhumane treatment in the workplace."

⁵ "Safe and healthy workplace" is defined using the AFi definition from the ILO Constitution as "workplaces in which companies take effective steps to prevent potential health and safety incidents and occupational injury or illness arising out of, associated with, or occurring in the course of work."

V. Oversight

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