

US FOODS® HOLDING CORP.
SUPPLIER CODE OF CONDUCT
Effective Date: November 21, 2025

I. Purpose and General Principles

This Supplier Code of Conduct (the “Code”) outlines US Foods’ requirements and expectations for suppliers¹. This Code is informed by the US Foods Guiding Principles set forth in US Foods’ Human Rights Policy ([accessible here](#)) and the policies therein, and by the [Accountability Framework](#) (“AFi”) guidance, and uses some of AFi’s relevant definitions² to define our supplier expectations and requirements.

II. Scope

This Code applies to all US Foods direct trade suppliers unless otherwise specified. We expect that suppliers understand our expectations and requirements as outlined in this Code and have adequate management processes and worker training in place to ensure compliance with this Code.

This Policy is supplemented by the following US Foods policies and commitments, each with its own defined scope:

- Human Rights Policy ([accessible here](#))
- Forests Policy ([accessible here](#))

III. Supplier Expectations and Requirements

A. Legal Compliance

Each supplier is required to conduct business in full compliance with all applicable national, regional, state, and local laws and regulations, and all applicable laws of the countries in which the supplier operates, including and without limitation all trade, export, and import controls and all applicable antitrust and fair competition laws.

B. Labor and Human Rights

Each supplier is expected to adopt human rights principles comparable to the US Foods Guiding Principles, as described in US Foods’ Human Rights Policy. Suppliers are required to:

- Prohibit child labor, forced labor or compulsory labor, and human trafficking;
- Ensure compliance with applicable wage, hours, and benefits laws, including those relating to minimum wage, working hours, rest periods, and overtime work and pay;
- Verify the employment eligibility of workers;
- Respect the right of workers to freely associate, organize, and bargain collectively in full compliance with applicable laws;
- Ensure a workplace free from discrimination and harassment, especially based on race, color, gender, gender identity, age, sexual orientation, religion, caste, national origin, ethnicity, marital status, disability, pregnancy, dependents, or political beliefs;

¹ “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.

² <https://accountability-framework.org/use-the-accountability-framework/definitions/> (last accessed 10/7/2025)

- Ensure compliance with applicable health and safety laws;
- Ensure protection from abusive practices or undue disciplinary measures³.

C. Rights of Indigenous Peoples and Local Communities

Where applicable, each supplier is expected to carry out operations consistent with the United Nations (“UN”) Declaration on the Rights of Indigenous Peoples⁴ (“UNDRIP”), including relevant Articles related to conducting a process of Free, Prior, and Informed Consent (“FPIC”) prior to any activities that might affect the rights⁵ of indigenous peoples and local communities (“IP and LC”).

D. Environmental Stewardship

Suppliers are expected to calculate, at minimum, their Scope 1 and Scope 2 greenhouse gas (“GHG”) emissions using a credible and recognized accounting standard such as the GHG Protocol⁶. Suppliers are expected to provide emissions data to US Foods upon request or by public disclosure.

Suppliers of US Foods Exclusive Brands⁷ products producing or sourcing any potentially high-forest-risk commodity⁸ or commodities are expected to have purchase controls and supplier management processes in place to ensure they do not conduct, participate in, or otherwise contribute to deforestation⁹ or ecosystem conversion¹⁰ in their production or sourcing, with respect to those high-forest-risk commodities used in/for Exclusive Brands products, and to have measures in place to help support the long-term protection of natural forests¹¹ and ecosystems. Relevant suppliers are expected to use the High Carbon Stock Approach (“HCSA”)¹² to guide site planning that protects natural forests and other natural ecosystems, where applicable. In cases where Exclusive Brands products suppliers verify that they have caused or directly contributed to deforestation or ecosystem conversion, they are expected to provide remediation based on mutually-agreed, open, transparent, and consultative processes. For additional information on US Foods’ forests-related commitments and targets, suppliers should see the US Foods Forests Policy ([accessible here](#)).

E. Product Safety, Quality, and Regulatory Compliance

Each supplier is required to provide products that meet or exceed all applicable legal, regulatory, and contractual standards for product safety and quality. Suppliers must immediately report to US Foods any deficiencies in product safety or quality so that appropriate actions may be taken to recover products if deemed necessary.

³ “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.”

⁴ <https://www.ohchr.org/en/indigenous-peoples/un-declaration-rights-indigenous-peoples> (last accessed 10/7/2025)

⁵ “Rights” in this context are described in the Articles of the UNDRIP.

⁶ <https://ghgprotocol.org/> (last accessed 10/7/2025)

⁷ 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.

⁸ High-forest-risk commodities include cattle, palm oil, direct and embedded soy, cocoa, plantation rubber, coffee, and plantation wood fiber (Source: [World Resources Institute](#), last accessed 10/7/2025).

⁹ “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.”

¹⁰ “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.”

¹¹ “Natural forests” is defined using the AFi definition as “a forest that is a natural ecosystem.”

¹² <https://highcarbonstock.org/> (last accessed 10/7/2025)

F. Ethical Business Practices

Each supplier is required to prohibit misuse of company assets, corruption, bribery, conflicts of interest, improper gifts, fraud, and embezzlement. Suppliers must abide by US Foods' policies prohibiting improper gifts or entertainment, including our Gifts and Entertainment Policy ([accessible here](#)).

G. Confidentiality and Privacy

Suppliers with access to confidential and/or proprietary information about or provided by US Foods are prohibited from disclosing that information to any other person or entity without our prior written consent. Confidential and/or proprietary information includes, without limitation, product specifications, cost, pricing, and customer information. Additionally, suppliers must protect from unauthorized disclosure any private information regarding US Foods' customers or associates that the supplier may receive, including, without limitation, home addresses; Social Security numbers; birth dates; credit card, banking, or other financial information; and medical information. Any unauthorized disclosure of confidential, proprietary, or private information related to US Foods, its associates, or customers must be reported immediately to US Foods' Legal department or to the US Foods Check-in Line, 1-888-310-7716 or online at usfoodscheckinline.com.

V. Management and Monitoring Systems

This Code is made available to all suppliers via the Company's website ([accessible here](#)) and via the Company's Supplier Portal. We will notify suppliers of updates, additions, or changes to the Code using a bulletin in the Supplier Portal. We expect suppliers to keep informed about updates, additions, or changes to this Code, as well as to supplemental policies and commitments. We will work with our suppliers, as needed, to ensure that they fully understand the requirements of this Code.

Non-compliance with this Code might be monitored through screening tools and audits, as needed. US Foods would prefer to work with suppliers to correct violations of this Code; however, if a supplier fails to make satisfactory progress toward resolving violations or refuses to do so, or if US Foods deems necessary based on the severity of the violation, US Foods may terminate its business relationship with the supplier. Suppliers must inform US Foods immediately of any non-compliance with the requirements of this Code, including, without limitation, any regulatory compliance failures or other events that may put our associates, customers, or brand reputation at risk by emailing compliance@usfoods.com.

Our expectation that suppliers comply with this Code is included in US Foods' Supply Chain Collaboration Policy, applicable to the majority of the Company's direct trade suppliers.

VI. 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 UN Guiding Principles on Business and Human Rights ("UNGPs") Effectiveness Criteria.

VII. Oversight

This Policy has been approved by senior management. The Nominating and Corporate Governance Committee of our Board of Directors provides ultimate oversight for responsible sourcing as part of its larger responsibility over the Company's sustainability program. Additionally, the Audit Committee of our Board of Directors oversees ethics and compliance matters, including the handling of grievances.