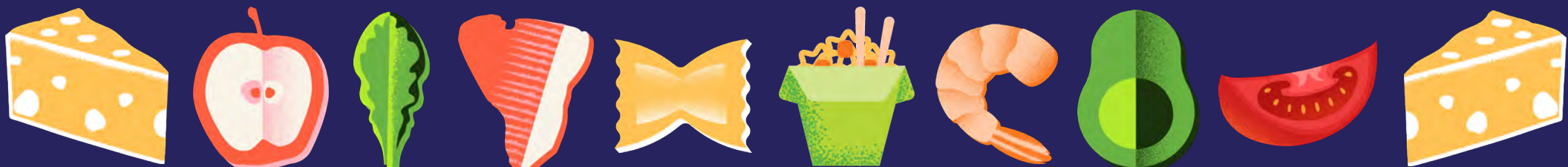
Sysco®

GLOBAL CODE OF CONDUCT

WE ARE ROOTED IN INTEGRITY



LETTER FROM OUR PRESIDENT & CEO

Sysco Colleagues,

Welcome to our new Global Code of Conduct. This Code reflects who we are and what is important to us at Sysco. It gives meaning to our Purpose: *Connecting the world to share food and care for one another*, and it is the foundation of our shared Values. Here you will find the core ethical and behavioral standards that guide us and show how we act as individuals and as a Company.

Every day, each of us makes decisions that impact Sysco's reputation and our relationships with each other, our customers, our suppliers, and our communities. Wherever we operate in the world, whatever job we do, being rooted in integrity means living our Values every day.

This Global Code of Conduct, together with related policies and procedures, empowers us by providing the information and guidance we need to do the right thing. It also enables Sysco to be a great place to work, one that is inclusive, safe, and welcoming for all. Please read it, keep it handy, and refer to it often. If you're unsure what to do in a situation, or have questions, please ask for guidance in following our Code.

Thank you for your commitment to doing the right thing. I'm proud of our reputation as a leader in our industry and the lasting legacy we are creating together.

Sincerely,

Kevin Hourican,
President and CEO

CONNECTING THE WORLD TO SHARE FOOD AND CARE FOR ONE ANOTHER

TABLE OF CONTENTS

LETTER FROM OUR PRESIDENT & CEO 2

WHAT WE STAND FOR 4

We Abide by the Letter and Spirit of Our Code 6

We Do the Right Thing Even if No One is Watching 6

We Lead by Example 6

We Seek Guidance When We Have Questions 7

We Speak Up 8

We Don't Retaliate 8

WE HAVE A SAFE, RESPECTFUL, AND INCLUSIVE WORKPLACE 10

We Respect Each Other 11

We Celebrate Diversity 12

We Uphold Human Rights 13

We Promote Safety in Everything We Do 13

WE DO BUSINESS ETHICALLY AND RESPONSIBLY 14

We Compete Fairly 15

We Provide and Receive Gifts and Entertainment Appropriately 16

We Sell and Market Honestly 17

We Don't Accept or Offer Bribes 17

We Distribute Safe and Quality Products 19

We Follow Trade Compliance Rules 19

We Do Not Enable Money Laundering 19

WE PROTECT SYSCO 20

We Avoid Conflicts of Interest 21

We Protect Sysco's Assets and Confidential Information 23

We Maintain Truthful and Accurate Accounts, Books, and Records 24

We Communicate with Integrity 25

We Don't Trade on Inside Information 25

We Engage in Political Activities Appropriately 26

WE CARE ABOUT PEOPLE, PRODUCTS, AND OUR PLANET 27

We Care for People 28

We Source Products Responsibly 28

We Protect the Planet 28

WHAT WE STAND FOR

TABLE OF CONTENTS

We Abide by the Letter and Spirit of Our Code 6

We Do the Right Thing Even if No One is Watching 6

We Lead by Example 6

We Seek Guidance When We Have Questions 7

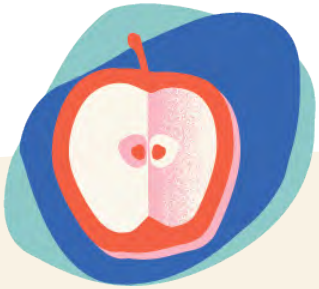
We Speak Up 8

We Don't Retaliate 8

OUR PURPOSE

At Sysco, we live our Purpose through our Mission, Identity, Values, and our Code, which brings to life the principles we stand for. Our Code defines how we do business with integrity, consistent with our commitment to demonstrating the highest ethical standards in everything we do.

CONNECTING THE WORLD TO SHARE FOOD AND CARE FOR ONE ANOTHER

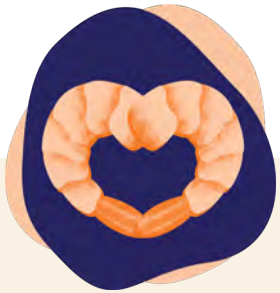


OUR MISSION

Delivering success for our customers through industry-leading people, products and solutions.

OUR IDENTITY

Together we define the future of foodservice and supply chain.



OUR VALUES

Rooted in Integrity, Committed to Inclusion, Driving Forward Together, Defining Excellence and Growing Responsibly.

OUR ACTIONS ARE ROOTED IN INTEGRITY

Our Code unites our diverse global organization with a shared set of principles and standards for conducting business ethically and responsibly. Our directors, leaders, and colleagues throughout our global enterprise follow our Code.

WE ABIDE BY THE LETTER AND SPIRIT OF OUR CODE

Our Code and our policies serve as guardrails to promote ethical and lawful activity in the countries where we operate. Because our Code and policies cannot cover every situation, we make decisions consistent with our Values and the principles contained in our Code.

WE DO THE RIGHT THING EVEN IF NO ONE IS WATCHING

Our Code and Values empower us to make the right decisions. Making decisions consistent with our Code and Values is the only way to do business at Sysco.

WE LEAD BY EXAMPLE

We all play a role in creating a culture of integrity by:

- Ensuring that we and those we lead understand how our Code and policies and applicable laws relate to our work
- Encouraging ethical decision making
- Creating a safe and inclusive environment where we can speak up without fear
- Taking reports of misconduct seriously by seeking support and raising issues with others, when appropriate
- Preventing retaliation for concerns raised in good faith

WE SEEK GUIDANCE WHEN WE HAVE QUESTIONS

When we are not sure about a course of action,

WE ASK:

- Does it reflect Sysco's Values and Purpose?
- Is it good for Sysco, our customers, and the communities we serve?
- Would we be comfortable if everyone knew about it?

If the answer is "no" or "not sure" to any of these questions, we stop, reconsider, and ask for help from:

- Our immediate or next level leader
- Our HR representative
- Sysco's Ethics & Compliance Global Support Center
- Sysco's Legal Department

WE SPEAK UP

We all have a seat at Sysco's table, and we are responsible for doing our part to uphold our Values in the workplace. If we think something isn't right, we must speak up and share our concerns.

ETHICS LINE

877.777.4020*

** For international numbers, please click here and select your location from the list.*

ETHICS LINE ONLINE

ethicsline.sysco.com

OPEN-DOOR CHANNELS

- Your immediate or next level leader
- Your HR representative
- Sysco's Ethics & Compliance Global Support Center
- Sysco's Legal Department

THE ETHICS LINE IS OUR TOLL-FREE NUMBER OPERATED BY AN INDEPENDENT THIRD PARTY AND IS AVAILABLE 24 HOURS A DAY, SEVEN DAYS A WEEK, 365 DAYS A YEAR.

WE DON'T RETALIATE

We don't retaliate against colleagues who speak up and raise concerns in good faith. "Good faith" means the person expressing the concern sincerely believes that it involves a violation of our Code, Sysco's policies, or applicable Law and should be raised. Concerns about retaliation should be raised and will be addressed appropriately, consistent with our Code and Values.

GOVERNMENT REPORTING RIGHTS

Nothing in this Code, any Company policy, confidentiality agreement, employment agreement, or other Company document prohibits or restricts any individual from communicating directly with, reporting possible violations of law or regulation to, filing a complaint with, providing information to, or cooperating with any governmental agency, regulator, law enforcement authority, or self-regulatory organization. And this Code does not prohibit disclosures that are protected under applicable whistleblower laws. However, colleagues are encouraged, whenever appropriate, to utilize the Company's internal reporting channels so that concerns may be addressed promptly and effectively.

Q **I am concerned that my leader's actions are not consistent with our Code, but I'm not sure. Should I still report it?**

A Yes. If you have questions about your leader's actions and you don't feel comfortable discussing it directly with your leader, you should use an alternative reporting mechanism to voice your concerns.

OUR ETHICS & COMPLIANCE TEAM REVIEWS INFORMATION TO IDENTIFY APPROPRIATE NEXT STEPS.

THINGS WE DO

- ✓ Take all concerns seriously
- ✓ Take steps to prevent retaliation
- ✓ Impartially review all concerns raised
- ✓ Protect confidentiality to the extent possible
- ✓ Treat all parties with respect

THINGS WE DON'T DO

- ✗ Do not tolerate retaliation
- ✗ Do not discuss the investigation with people inside or outside the Company who have no need to know about it
- ✗ Do not lose objectivity
- ✗ Do not allow bias
- ✗ Do not invade colleagues' privacy

WE HAVE A SAFE, RESPECTFUL, AND INCLUSIVE WORKPLACE

TABLE OF CONTENTS

We Respect Each Other 11
We Celebrate Diversity 12
We Uphold Human Rights 13
We Promote Safety in Everything We Do 13

WE RESPECT EACH OTHER

We value each individual and treat each other with dignity and respect. We do not tolerate any form of harassment or bullying.

LEARN MORE

Wherever we operate, we don't tolerate actions that could be perceived as harassment. While the exact legal definition may vary by country, at Sysco, we define "harassment" as verbal or physical behavior that could be considered:

- Unwelcome
- Offensive
- Degrading
- Intimidating
- Hostile
- Likely to make someone uncomfortable

Remember, harassment—sexual or otherwise—is determined by how others perceive your actions, not by your actual intentions. Similarly, Sysco is an equal opportunity employer and is committed to a workplace that is free from discrimination. We make job-related decisions regarding colleagues and applicants based on merit, qualifications, and job-related requirements, without regard to individual or personal characteristics, including:

- Race, color, ethnicity, or national origin
- Gender or gender identity
- Sexual orientation
- Age
- Religion
- Disability
- Veteran status
- Any other legally protected status

Q My colleague likes to crack jokes, but some of her jokes might be inappropriate and they often make other people visibly uncomfortable—especially those on topics of sex, orientation, religion, race, and ethnicity. However, I don't think she means any harm. What should I do?

A While humor is generally good, we should be careful that it doesn't create an uncomfortable environment. Remember, conduct that is unwelcome or offensive can amount to harassment , even if it doesn't reflect bad intentions. You should talk to your colleague about it, and if the situation doesn't change, report it.

Q What employment actions may be considered discriminatory?

A Making job-related decisions based on an individual's personal characteristics is always against our policies and is prohibited under the laws of many countries.

WE CELEBRATE DIVERSITY

We are committed to building an inclusive work environment that reflects the customers and communities we serve. To that end, we value diversity in our colleagues, our customers, our suppliers, and our business partners. We promote equal opportunity in our hiring and advancement practices and make sure that all recruiting and performance decisions are based solely on job-related criteria. We do not tolerate discrimination of any kind with respect to employment decisions.

OUR COMMITMENT

We aspire to create a global culture that is inclusive. We strive each day to foster belonging, as we care for one another and connect the world through food and trusted partnerships. At Sysco, we believe that an inclusive environment can enable growth, and it is a source of competitive advantage in the marketplace. We are committed to maintaining a culture where everyone who is part of the Sysco ecosystem is valued, respected, and has a seat – and a voice – at our table.

WE UPHOLD HUMAN RIGHTS

We follow the UN Global Compact and the Universal Declaration of Human Rights. We strongly believe that everyone has the fundamental right to work in a safe, inclusive, and positive environment. We show our commitment to these principles in several ways:

- We prioritize, respect, and protect fundamental human rights
- We operate globally in a manner that supports basic human rights, including the rights of colleagues to have fair wages and benefits in accordance with local laws, an active social dialogue, a safe and healthy working environment, the opportunity to associate freely with others, and a workplace free of harassment and discrimination
- We prohibit child labor, forced labor, and human trafficking, and do not tolerate this conduct anywhere in our global supply chain
- We expect every supplier who does business with us to uphold these principles, and we refuse to knowingly work with business partners who violate these standards

Actual or suspected human rights abuses should be reported to any of the resources in the "Speak Up" section of our Code.

WE PROMOTE SAFETY IN EVERYTHING WE DO

We are committed to providing safe and healthy work environments for all Sysco colleagues, as well as our visitors, contractors, and business partners. We demonstrate our commitment by:

- Conducting risk assessments, identifying hazards, and implementing controls
- Going beyond compliance through a behavior-based safety strategy
- Maintaining rigorous health and safety programs and procedures
- Never turning a blind eye to a safety hazard
- Having zero tolerance for workplace violence
- Ensuring a drug and alcohol-free workplace
- Maintaining workplace health and well-being programs

Fulfilling our Purpose to care for one another means we must each do our part to ensure each other's safety. We protect each other by immediately reporting any unsafe working conditions, safety risks, accidents or injuries, as well as any situation that might become hazardous.

LEARN MORE

Providing a safe workplace demands a zero-tolerance policy for workplace violence. We prohibit all forms of violence that could cause a person to feel unsafe, insecure, or fearful, including verbal or physical assaults, threats, or any expressions of hostility or aggression. If you are a victim of violence or believe someone might be in imminent danger, you should immediately contact your local emergency service or local law enforcement authority and, when safe, report the situation to your leader, to Human Resources, or to a safety or security representative at your location.

LEARN MORE

Working under the influence of drugs or alcohol impairs job performance and jeopardizes everyone's safety. Drugs may include illegal drugs, controlled substances, and misused or unauthorized prescription medication. We prohibit:

- Working under the influence of alcohol, illegal drugs, or legal drugs used improperly
- Possessing, selling, using, transferring, or distributing illegal drugs or alcohol on Sysco's premises or while working on behalf of Sysco.

We may be subject to drug and alcohol testing in accordance with applicable law. Colleagues struggling with a drug or alcohol problem are always encouraged to seek help and assistance.

WE DO BUSINESS ETHICALLY AND RESPONSIBLY

TABLE OF CONTENTS

We Compete Fairly 15

We Provide and Receive Gifts and Entertainment Appropriately 16

We Sell and Market Honestly 17

We Don't Accept or Offer Bribes 17

We Distribute Safe and Quality Products 19

We Follow Trade Compliance Rules 19

We Do Not Enable Money Laundering 19

WE COMPETE FAIRLY

We believe in fair competition in a free market that supports the integrity of the marketplace. We always compete on the merits of our great products and services, and we are careful to follow all applicable competition laws, including those regarding our interactions with competitors. We also compete fairly for talent and do not enter into agreements (formal or otherwise) that prevent us from hiring or recruiting talent from other companies or prevent others from hiring or recruiting Sysco colleagues, except as permitted by law.

Q I'm a sales consultant and one of my customers showed me a copy of its agreement with one of our competitors. Can I use this information?

A While a customer may typically attempt to negotiate amongst competitors for the best deal, you must use caution when a customer has entered into a contract with a competitor. You should not use information about a competitor shared by a customer if that information is contained in a contract between the customer and the competitor and customer has an obligation to keep the terms of the contract with the competitor confidential.

Q I'm a sales manager at Sysco. I have friends who work for competitor companies. When we meet socially, they sometimes want to talk about business. Is this okay?

A We should be careful to avoid any discussions that could be viewed as entering into an agreement with a competitor—even an informal unwritten one—to:

- Set prices or other sales terms (price fixing)
- Coordinate bids (bid rigging)
- Divide sales territories, customers, or product lines (market allocation)
- Exchange competitive price information (cartel activity)

Even casual conversations can be misunderstood or misinterpreted. If a competitor tries to engage you in a discussion about pricing/price lists, bidding processes, or customers, you should immediately end the conversation.

Q I heard that a couple of leaders from Sysco and another company in our industry met over golf and agreed not to hire or try to hire each other's top talent. I don't know if there's anything wrong with this; they are just trying to retain good employees. Is this okay?

A This type of arrangement can be considered an anti-poaching/non-hire agreement, where employers agree to refrain from hiring or recruiting (poaching) each other's talent. An agreement that has no purpose besides limiting competition for talent can be considered a violation of competition law. You should promptly report this situation to Sysco's Legal Department or Ethics & Compliance Team.

WE PROVIDE AND RECEIVE GIFTS AND ENTERTAINMENT APPROPRIATELY

We are committed to doing business with integrity and understand gifts and entertainment play a positive role in building relationships with customers, suppliers and other third parties.

We also understand accepting or receiving gifts or entertainment may create an actual or perceived conflict of interest and should occur infrequently.

Free travel benefits (e.g., air transportation and lodging) may not be accepted from a third party who does or wants to do business with Sysco during ongoing commercial negotiations with that third party. In all other instances, acceptance of free travel benefits requires direct approval from your functional VP or country leader, as applicable.

Q **I'm planning to visit an established supplier's facility to discuss a potential partnership. The supplier suggested I add a few extra days to the business trip to enjoy a weekend at an all-inclusive seaside resort that he owns. He even suggested that I bring my significant other with me. I guess this is a simple "thank you" gesture from the supplier that is not really costing them anything; it's a low volume season and the resort is half empty anyway. The trip is not likely to make me treat this supplier any differently, but it will help maintain a good relationship. Can I accept the invitation?**

A Whether you travel alone or with your significant other, and regardless of the season, side trips like this have monetary value well above Sysco's limit for ordinary business courtesies. You should politely decline, as it would be inappropriate to accept the offer.

GIFTS & ENTERTAINMENT

THINGS WE DO

- ✓ Ensure that gifts offered or received do not exceed $100 USD in value
- ✓ Ensure that entertainment offered or received does not exceed $250 USD in value
- ✓ Ensure all gifts or entertainment are irregular in nature and always comply with the Code
- ✓ Politely decline if a gift exceeds $100 USD in value or entertainment exceeds $250 USD in value and explain Sysco's Policy
- ✓ Ensure all branded merchandising gifts are legitimate and proportionate to the business
- ✓ Ensure all entertainment has a legitimate business interest
- ✓ Ensure all entertainment includes individuals who we are doing or intend to do business with
- ✓ Ensure gifts or hospitality also comply with the third parties' equivalent gifts and hospitality policy

THINGS WE DON'T DO

- ✗ Discuss, offer or receive any gifts or entertainment activity involving public officials or their family members
- ✗ Offer or accept any gifts or entertainment intended (or with the appearance) to influence business decisions or create an obligation to do something in return
- ✗ Offer or accept any gifts that are in cash or a cash equivalent (e.g., gift cards, vouchers, loans, etc.)
- ✗ Offer or accept any gift or entertainment that is not consistent with the Code or may cause offense under local norms and customs

WE SELL AND MARKET HONESTLY

Our marketing and sales efforts reflect Sysco's high ethical standards at all times.

We respect our relationships with our customers by:

- Earning their business on the basis of our superior products, customer service, and competitive prices
- Presenting our products and services in an honest manner
- Never engaging in unfair or deceptive trade practices, including making misleading, unsubstantiated, or untruthful claims about Sysco or our competitors

WE DON'T ACCEPT OR OFFER BRIBES

We don't exchange anything of value with a third party (including a supplier, customer, or government official), either directly or indirectly, to influence a business decision or otherwise gain an unfair advantage. We don't allow "facilitating payments" (also known as "grease payments").

A facilitating or facilitation payment is a payment (in the form of cash or something of value) given to a government official or employee in order to get that person to quickly do what they should have done anyway, such as process paperwork or licensing or perform a routine transaction or service to which an individual or company is entitled.

We require all those who work with us or act on our behalf, including our agents, consultants, and other third parties, to follow all applicable anti-bribery rules and regulations.

Q What is "anything of value"?

A "Anything of value" includes money, goods, services, or favors, including cash, gift cards, meals and entertainment, event tickets, travel perks, use of vacation homes, expensive holiday gifts, free airfare or accommodations, special privileges, donations to designated charities, discounts, free services, financial or property loans, or a promise of future employment.

"Anything of value" would be considered offered "indirectly" if, for example, it was given ***by*** someone doing business on Sysco's behalf or given to a family member of a Sysco colleague.

LEARN MORE

Before offering or accepting a business gift, a meal, or corporate hospitality, always check to ensure it is consistent with our Code and meets the following criteria:

- ✓ Nominal value not to exceed $100 USD for gifts or $250 USD for entertainment (or its equivalent)
- ✓ Reasonable in frequency
- ✓ Has a legitimate business purpose
- ✓ Consistent with customary good business practices and good taste
- ✓ Permitted by the customer's or supplier's own policies
- ✗ Won't be considered a business promise or "quid pro quo"
- ✗ Won't be perceived as a payment offered to gain an unfair advantage
- ✗ Won't create the appearance of impropriety or a conflict of interest

If the gift, meal, or entertainment does not meet all of the above criteria, we may not offer or accept it.

Q I was given an expensive gift by one of our suppliers. I took it because I didn't want to be rude or cause offense. I think it was well-intentioned and it's highly unlikely it would inspire me to treat that supplier any differently, but I'm not comfortable because of its value and what others may think. Is it okay?

A Appearances matter, even if there is no corrupt intent behind the gift. It's always a good idea to decline an improper or questionable gift politely and respectfully, citing the relevant Sysco policy. Most likely, the supplier will understand. However, we recognize that some people may feel awkward refusing a well-intentioned gift. If you accepted a gift that you shouldn't have accepted, don't hide it. Discuss the situation with your leader or with Sysco's Ethics & Compliance team for further guidance. Depending on the circumstances, you may be permitted to keep it, required to return it, asked to donate it to charity, or (in case of food items) asked to share it with your team.

Q We need to engage a consultant to help with the renewal of some regulatory permits that are essential to our business. One person comes highly recommended by people I trust, but his fees are on a higher side. He has a reputation for getting things done, even in complex situations. I interviewed him and got the impression that he is very well connected with the key decision-makers in a critical government agency, which could be helpful. Is it okay to retain him?

A You must consult with the Legal or Compliance team before engaging this consultant. Based on your observations, there is a high risk that some of the fees we pay to this consultant will be passed on as bribes. Indirect bribery by a Sysco intermediary is illegal and can create significant problems for Sysco, even if we didn't authorize it and even if we didn't know about it. We are ultimately responsible for the actions our business partners undertake on our behalf. You should be vigilant for any red flags of a corrupt activity.

WE DISTRIBUTE SAFE AND QUALITY PRODUCTS

We ensure that our customers receive the safest and highest quality products and services.

We prioritize product quality, consistency, value, and food safety. We are proud of every product we provide our customers. Our customers show their trust in the quality of our products and services with each purchase they make.

To ensure optimal quality for every product we distribute, we have robust food safety and quality compliance programs across our entire supply chain. Sysco colleagues receive rigorous training on our food safety management systems. We ensure quality and food safety by:

- Fully understanding our food safety policies, systems, and procedures that apply to the products we handle
- Complying with all food safety laws and regulations
- Confidentially reporting a food safety concern or violation to management or via the Sysco ethics line (877-777-4020)*

* *For international numbers, please click here and select your location from the list.*

WE FOLLOW TRADE COMPLIANCE RULES

When we import and export goods, we must comply with applicable international trade regulations.

As a global leader in our industry, we must be aware of trade restrictions that govern business dealings with certain countries, entities, and individuals, including our actual or potential business partners, customers, and suppliers. These restrictions include complex laws governing the import or export of goods and services across national borders.

Regardless of where we are located, we must understand and comply with all trade embargoes, economic sanctions, and trade restrictions imposed by the governments of any country where we operate.

WE DO NOT ENABLE MONEY LAUNDERING

We conduct business with reputable business partners, for legitimate purposes, with legitimate funds.

We comply with all laws that prohibit money laundering and financing for illegal or illegitimate purposes. People engage in money laundering to try to conceal illegal funds or try to make the sources of illicit funds look legitimate. To prevent money laundering, we must know our customers, suppliers, and other business partners to ensure they are engaged in legitimate business activities.

Knowing our customer means we make every effort to verify the identity, suitability, and risks involved with maintaining a business relationship so we can avoid having commercial relationships with entities or individuals that are involved in terrorism, corruption, money laundering, or other wrongdoing.

WE PROTECT SYSCO

TABLE OF CONTENTS

We Avoid Conflicts of Interest 21

We Protect Sysco's Assets and Confidential Information 23

We Maintain Truthful and Accurate Accounts, Books, and Records 24

We Communicate with Integrity 25

We Don't Trade on Inside Information .. 25

We Engage in Political Activities Appropriately 26

WE AVOID CONFLICTS OF INTEREST

We don't compete with Sysco's business and never let our business decisions be influenced, or appear to be influenced, by personal interests. We act in the best interest of our Company at all times.

A "conflict of interest" exists when a personal interest conflicts with our obligations to the Company. Even the mere appearance of a conflict can seriously undermine trust and integrity.

We avoid conflicts. If, at any time in your employment with Sysco, you think a personal or professional relationship could be considered a conflict of interest, you must promptly disclose that potential conflict to Sysco. Remember, having a conflict of interest is not necessarily a Code violation, but failing to disclose it is. In many instances, a conflict of interest can be resolved quickly after an open and honest discussion by implementing steps to eliminate or mitigate the problem.

FINANCIAL

Putting personal financial interests over those of Sysco.

BUSINESS OPPORTUNITIES

Using opportunities that are discovered through your work at Sysco for personal gain.

PERSONAL

Prioritizing loyalty to friends, family, or romantic partners when making professional decisions.

PROFESSIONAL

Entering into contractual or business relationships with entities with which Sysco does or seeks to do business.

LEARN MORE

Some common examples of conflicts of interest include:

- Engaging in a personal activity, investment, or association with a customer, supplier, or competitor that may compromise—or appear to compromise—your objectivity or your ability to make impartial business decisions
- Awarding a Sysco contract to a friend or a family member
- Receiving some form of personal or financial reward or compensation from a company that does business with Sysco
- Having outside employment that could affect job performance at Sysco
- Working for or providing services to Sysco's competitors, customers, or suppliers while employed with Sysco
- Hiring or supervising a family member or romantic partner
- Using Company property or resources for personal gain
- Taking personal advantage or profiting from a business opportunity that you learn about only through employment at Sysco

Q I think my pension fund has some stock investments in Sysco's competitors. Does this create a conflict of interest?

A No. A nominal stock holding (generally less than 1%) does not create a conflict of interest, especially if made through a publicly traded mutual or pension fund.

Q My Sysco facility is looking for a new supplier of cleaning services and my brother happens to own the best local cleaning company. Can I recommend it to Sysco?

A You can certainly recommend your brother's company to Sysco, and your brother can bid on the work, provided your job responsibilities do not involve managing the cleaning service at your location. Sysco selects suppliers fairly and based strictly on merit. That means you cannot help your brother in any way, including providing him with information not available to other bidders. That would be a conflict of interest and it could create the appearance that your brother's company was selected because of you. You also must disclose your family connection with a potential supplier to Sysco and stay out of the bidding and selection process entirely to ensure its integrity.

Q I've heard that Sysco is expanding into an ethnic cuisine market, and I have some information on where they are looking to invest and potential targets. I've become aware of a smaller ethnic foodservice distributor in a highly desirable market for Sysco, but the Company hasn't expressed any interest yet. I don't believe I have a conflict of interest because Sysco hasn't made an offer. Could I invest in the distributor?

A No. Profiting from business opportunities that we learn about through our employment at Sysco is a clear conflict of interest.

Q I believe my colleague may have a conflict of interest, specifically I believe his sibling owns a restaurant which is a Sysco customer. What should I do?

A Many conflicts of interest can be successfully resolved or mitigated, but failing to disclose an actual or potential conflict is a violation of our Code. If you have any concerns, you should speak up. Potential conflicts can be reported to:

- Your immediate or next level leader
- Your HR representative
- Sysco's Ethics & Compliance Team
- Sysco's Legal Department
- Sysco's Ethics Line

WE PROTECT SYSCO'S ASSETS AND CONFIDENTIAL INFORMATION

We trust our colleagues to use Sysco resources properly. We protect the Company's assets, including physical and intellectual property, confidential information, and personal data. Likewise, we protect the property that other parties entrust to us.

LEARN MORE

Intellectual property includes trademarks, logos, service marks, copyrights, patents, trade secrets, product development, pricing, and cost information; marketing campaigns and promotions in development; and any ideas or practices that give the Company a competitive advantage. To maintain the value of our intellectual property, we must ensure its proper use.

LEARN MORE

Physical assets include facilities, currency, supplies, equipment, vehicles, machinery, spare parts, raw ingredients, and finished products.

We are often exposed to confidential information that belongs to Sysco, or to a customer or supplier, while doing our jobs. We protect all confidential information we come into contact with to protect Sysco's assets and maintain trust with our business partners.

Protecting confidential information also includes safeguarding the integrity of Sysco's information technology systems and maintaining adequate information security.

LEARN MORE

With the large IT systems that Sysco maintains, and the number of people who use them daily, there are many access points that must be safeguarded. We keep our IT systems secure by taking measures to minimize the risk of breaches of our data security. These measures are outlined in our global cybersecurity and data protection policies and procedures. In general, we should not:

- Leave Sysco-issued laptops, tablets, or other mobile devices unattended
- Share our passwords with anyone
- Download unauthorized or unlicensed software on Company devices

Protecting the personal data and privacy of our workforce is our priority. When we have access to the personal information of colleagues or business partners, we comply with our privacy policies and all applicable local laws and regulations regarding the collection, protection, use, transfer, and disclosure of personal data. Likewise, we also protect the personal data entrusted to us by our customers and suppliers.

Q What kinds of personal information must we protect?

A Personal information includes names, addresses, and phone numbers; government identification numbers such as passport, driver's license, or social security numbers; insurance and payment card information; professional and employment-related information (such as compensation); and education and medical data. Sometimes it would require multiple data points to enable someone to identify an individual, but each piece of information is still considered "personal data."

WE MAINTAIN TRUTHFUL AND ACCURATE ACCOUNTS, BOOKS, AND RECORDS

We ensure the accuracy, reliability, and integrity of Company records, including truthfulness of financial data. Our records must be a forthright presentation of the facts, reflecting all components of financial transactions and events. No matter what type of document or how insignificant it might seem, the information we maintain must always be honest, complete, accurate, and truthful.

Our business records should be maintained, retained, and destroyed in accordance with applicable legal and regulatory recordkeeping requirements.

When we are asked to participate in an investigation or audit conducted by the Company, a government agency, or a third-party audit firm, we cooperate fully and honestly.

WE COMMUNICATE WITH INTEGRITY

We believe in the value of clear, consistent, respectful, timely, and honest communication with each other and with all external parties. We receive many inquiries from the media and market analysts, and we have designated corporate communications professionals who, along with certain Sysco executives, are authorized to speak publicly on Sysco's behalf. When we receive requests for statements on behalf of Sysco, we refer these inquiries to the global communications team.

Social media tools have become an integral part of modern life, but inappropriate use of social media can put Sysco's reputation and confidential information at risk. We are free to use social media outside of work, but we must be careful about inadvertently disclosing confidential information or being perceived as communicating on behalf of Sysco.

Q I was invited to present at an industry conference, and I'd like to use a Sysco business case for my presentation. Is it okay?

A No. A Sysco business case may very well be in whole or part confidential and you should be careful that your presentation won't inadvertently disclose any confidential information. It's best to clear your presentation in advance with your leader and Sysco's global communications team.

WE DON'T TRADE ON INSIDE INFORMATION

We must be very careful to safeguard non-public, confidential information belonging to Sysco and never use it for personal gain.

The laws of many countries make it illegal for those with "inside information" about a company to trade in that company's securities. If you have access to inside information about Sysco or another public company—such as a customer or supplier—then insider trading laws apply to that information. We protect this information by never:

- Disclosing the information to anyone who doesn't have a business need to know it, including relatives and friends

- Selling, buying, or engaging in any other transaction in the securities of the company to which the inside information relates
- Engaging in illegal "tipping," or providing inside information to someone else who trades securities based on such information

LEARN MORE

Confidential information is deemed "inside" information when it is not public and would be important to an investor in making an investment decision. Here are some examples of inside information:

- A significant upward or downward revision of earnings forecasts
- A significant division restructuring
- Negotiations with a major supplier or customer
- A major management change
- A possible stock split
- Pending or threatened litigation
- A significant acquisition or divestiture
- An upcoming major product launch or innovation

WE ENGAGE IN POLITICAL ACTIVITIES APPROPRIATELY

Colleagues are free to participate in lawful political activity on a volunteer basis in their personal lives, during their own time, at their own expense, and not purporting to speak on behalf of Sysco. Colleagues may not use Company funds, property, or resources to support any political party, cause, or candidate, or encourage other colleagues, suppliers, or customers to support particular political parties, causes, or candidates. Sysco engages in the political process by providing financial support for select candidates and issue advocacy campaigns that support our business objectives. Contributions and involvement are determined by the Sysco Corporation Public Policy Committee, a multi-functional group consisting of members from Sysco's executive leadership, Government Relations, Legal, Investor Relations, Communications and other relevant functional leaders.

We don't make payments to foreign officials, political candidates, or political parties outside the U.S.

Eligible colleagues may voluntarily contribute to Sysco's political action committee (PAC). The activities of the Sysco PAC are governed by a Board of Directors and comply with all U.S. federal and state election laws.

Q **I feel passionate about upcoming elections and I want to invite my Sysco team to attend a political rally in support of my favorite candidate. Is this okay?**

A You're certainly free to participate in a political process, as long as your activities are clearly personal as described in this section.

WE CARE ABOUT PEOPLE, PRODUCTS, AND OUR PLANET

TABLE OF CONTENTS

We Care for People.....28

We Source Products Responsibly.....28

We Protect the Planet.....28

WE STRIVE TO BE RESPONSIBLE STEWARDS OF OUR COMPANY AND THE PLANET AND ARE FULLY COMMITTED TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS. OUR EFFORTS TO GROW RESPONSIBLY AND SUSTAINABLY ARE ANCHORED IN THREE PILLARS: PEOPLE, PRODUCTS, AND PLANET. WE CARE FOR PEOPLE, SOURCE PRODUCTS RESPONSIBLY, AND PROTECT THE PLANET.

WE CARE FOR PEOPLE

We believe that people thrive when they feel like they belong and when they can grow professionally, engage freely, give back to their communities, and know they are heard.

Community engagement is at the heart of our sustainability efforts. We strive to lead the foodservice industry by giving back, doing good, and changing lives to support the communities where we live and work.

*To learn more, see our **webpage**.*

WE SOURCE PRODUCTS RESPONSIBLY

We practice responsible sourcing: we select our suppliers based on merit, and we hold them accountable to our high standards of environmental, social, and ethical performance.

We source many products globally and recognize our sizeable supply chain and global reach represents both a competitive advantage and an opportunity for us to drive change in our industry by encouraging sustainable, ethical practices among our suppliers.

We strive to provide every customer with the highest quality of products, sourced ethically and responsibly. An unethical or illegal act by a supplier could hurt our reputation as a global foodservice leader and cause us to lose goodwill on the world stage.

Business dealings with our suppliers and business partners are based on the principles of fairness, honesty, and mutual respect. We select our suppliers and business partners competitively and strictly on merit, without improper favoritism of any kind.

WE PROTECT THE PLANET

We strive to grow our business while being stewards of our planet.

Our ability to serve our Purpose and continue delivering great quality, healthy, and sustainable food products to our customers is closely connected to a healthy planet. Therefore, the need to protect our environment and natural resources influences our business strategy and decisions. We believe there is an opportunity to continuously improve how the world produces, delivers, consumes, and disposes of food.

Our environmental stewardship focuses on reducing the environmental impact of our direct operations, including managing greenhouse gas emissions, energy use, and waste management, and partnering to advance sustainable practices across our value chain.

CONNECTING THE WORLD TO SHARE FOOD AND CARE FOR ONE ANOTHER

Sysco®

At the heart of food and service