



SYSCO CORPORATION  
**SUPPLIER**  
== CODE OF ==  
**CONDUCT**

Good things  
come from  
**Sysco**<sup>®</sup>



The business of Sysco Corporation and its operating subsidiaries, affiliates, and divisions (together, "Sysco") has been built upon the values of honesty, integrity, accountability, and quality relationships with our associates, customers, suppliers, shareholders, and communities. To meet this standard, Sysco requires each of its suppliers, and each of their subcontractors and supply chain providers that ultimately supply goods and services to Sysco (together, "you" or "your") to comply with this Supplier Code of Conduct (this "Code").

You will provide appropriate training measures so that your managers and employees understand this Code.

**1. Legal Requirements** – You must follow all national, state or regional, and local laws and regulations in the countries in which you operate including:

- (a) Trade** – Follow all trade controls, as well as all export, re-export, and import laws and regulations.
- (b) Antitrust** – Conduct business in compliance with antitrust and fair competition laws that apply to your businesses.

- (c) Boycotts.** Not participate in international boycotts that are not sanctioned by the United States government or applicable laws.
- (d) Anti-Corruption.** Not participate in bribes or kickbacks of any kind, whether when dealing with public officials or individuals in the private sector. Sysco is committed to adhering to all anti-corruption and anti-money laundering laws of the countries where Sysco operates. You must follow all anti-corruption and anti-money laundering laws, as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations. You must not, directly or indirectly, offer or pay anything of value (including travel, gifts, hospitality expenses, and charitable donations) to any official or employee of any government, government agency, political party, public international organization, or any candidate for political office to (a) improperly influence any official, employee, or candidate to promote the business interests of Sysco in any way, or (b) otherwise improperly promote Sysco's business interests. You must comply in all respects with Sysco's Anti-Corruption Policy.



**2. Confidentiality** – You will keep all of your supply agreements and arrangements with Sysco confidential, including pricing, marketing allowances, and all SYSCO® Brand product specifications. You will also keep all Sysco customer information confidential. Don't release any confidential information to third parties without getting Sysco's written consent beforehand.

### 3. Ethics Requirements

- (a) **Limitations on Gifts and Gratuities** – You will neither accept nor give payments or gifts to Sysco directors, officers, or employees or to third parties in exchange for business opportunities, as described in Sysco's Code of Conduct. If you would like more information, refer to Sysco's Code of Conduct and Section VI of the OECD Guidelines for Multinational Enterprises published by the Organization for Economic Co-operation and Development.
- (b) **No Retaliation** – You will have a no retaliation policy that allows your employees to speak with any Sysco employee without fear of retaliation by your management.
- (c) **Conflict of Interest** – You will let Sysco know of any actual and potential conflicts of interest that come up from business or personal relationships with Sysco's customers, suppliers, business associates, employees, or competitors.

### 4. Labor Requirements

- (a) **Human rights** – You will not violate basic human rights. More information can be found in the United Nations Declaration of Human Rights, the Conventions and Recommendations of the International Labor Organization ("ILO"), and the ILO Declaration on Fundamental Principles and Rights at Work.
- (b) **Child Labor** – All of your employees will be of legal age established by local law. If the local law does not set a minimum age, your employees must be at least fourteen (14) years old. You must maintain official and verifiable documentation of each of your employee's date of birth, or if documentation is not available, have a legally recognizable means of confirming your employees' age. An exception to this is legitimate workplace apprenticeship programs, which comply with all laws and regulations. Except where local law allows, workers under the age of eighteen (18) should not perform hazardous work and may be restricted from night work with consideration given to educational requirements. More details can be found in ILO Convention No. 138.
- (c) **Freedom of Association** – You will give your employees the right to freely associate and organize and to legally bargain collectively. More information can be found in ILO Conventions Nos. 87 and 98.

- (d) **Forced Labor or Physical Coercion** – Physical Coercion. Sysco will not tolerate any practice of forced, bonded, indentured, or slave labor or the use of physical or mental coercion or corporal punishment.
- (e) **Foreign or Migrant Workers** – If foreign or migrant workers are working for you, you must follow the labor and immigration laws of the host country. Before hiring, the basic terms of the employment must be provided to the workers in a language they understand. Workers will be able to keep their own passports and other forms of personal identification, which are never to be withheld by you or any third party.
- (f) **Wages and Benefits** – You will comply with all legal employment and labor requirements, including those relating to minimum wage and overtime. In countries that set a maximum work week, you will comply with those requirements.
- (g) **Recruitment Fees** – You shall not require workers to pay recruitment and/or hiring-related fees to employers, agents or labor broker outside legally allowed fees. All fees charged to workers must be disclosed in advance and documented in a language that the workers understand.
- (h) **Discrimination** – You must not discriminate on the basis of race, gender, religion, ethnicity, sexual orientation, nationality, or political beliefs. More information can be found in ILO Conventions Nos. 100 and 111.



## 5. Health, Safety, and Environmental

- (a) **Health and Safety** – Sysco requires that all facilities that are used to produce goods for Sysco have a safe and healthy work environment for all the employees. When housing is provided, it should also be clean and safe.
- (b) **Environment** – Sysco has a commitment to the communities where it operates and a responsibility for the environments that we impact. Sysco seeks to work with suppliers that share this commitment.

**6. Monitoring and Enforcement** – Sysco commits to independent third party monitoring of suppliers. To do business with Sysco, you must allow Sysco (and its representatives and agents) unrestricted access to each of your facilities and to all relevant records at any time, without advance notice, in order to monitor compliance with this Code. Sysco and/or its representatives or agents will comply with your reasonable safety rules while visiting your facilities.

**7. Violation of this Code** – If you violate this Code, Sysco may either terminate its business relationship with you, or may require the affected facility to implement a corrective action plan. Sysco will continue to develop its monitoring systems to assess and ensure compliance with this Code.

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Thank you for being a valued Sysco supplier and your commitment to upholding the values of this Supplier Code of Conduct.

### Additional Resources

OECD Guidelines for Multinational Enterprises

United Nations Universal Declaration of Human Rights

International Labour Organization Conventions and Recommendations

International Labour Organization Declaration on Fundamental Principles and Rights at Work

Sysco Corporation Code of Conduct

## Reporting Concerns

Any questionable or possible violation of this Code or other legal requirements, may be reported to a Sysco representative or through either of the following methods:

Phone:

**Sysco's Ethics Line 1.877.777.4020**

Web:

**[ethicsline.sysco.com](http://ethicsline.sysco.com)**

Sysco will maintain confidentiality to the extent possible and will not tolerate any retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Code.



[sysco.com](http://sysco.com)