



PERFORMANCE FOOD GROUP'S BUSINESS PARTNER CODE OF CONDUCT

Since our humble beginnings in 1885, Performance Food Group's success has been dependent on our ability to exceed customer expectations and drive customer success, on time and on budget. Over the years we have listened to our customers and transformed to better support their needs. It is on this historical foundation of customer service that we now look to the future and the best ways to serve our customers and our stakeholders. Today, customer service means treating all who we work with and impact as true partners in our collective success and committing to a set of fundamental performance criteria every business partner that works with PFG can count on. That means going beyond just what our partners can expect from us and defining mutual expectations focused on behaviors that are collectively good for both business and society. We are therefore excited to announce our recalibrated "Business Partner Code of Conduct."

Scope and objective

Performance Food Group (PFG) prides itself on forming authentic business partnerships built on trust, goodwill, and collaboration. PFG aims to cultivate transparent, fair, and ethical relationships with suppliers, distributors, and all other third parties, collectively known as our "Business Partners."

- This code applies to all PFG Business Partners.
- This code defines our conduct expectations of our Business Partners. We hold ourselves to the same expectations, as articulated in our Code of Business Conduct.
- Acceptance and adherence to this Code is mandatory for all Business Partners and is understood to be confirmed by the Business Partner's agreement to undertake business with PFG.

Environmental, Social, and Governance (ESG) alignment

- PFG strives to use its capabilities, geographic presence, and resources to positively impact and create value for all of our stakeholders. We believe it is in our best interest, and those of our customers and Business Partners, to use our scale and influence to address food-related societal challenges throughout America. We focus on addressing food insecurity, enabling access to nutritious options in geographies with *food deserts*, and promoting the adoption of sustainable food products, practices, and services.
- PFG prioritizes working with Business Partners that share this commitment to conduct business responsibly, sustainably, and in alignment with our ESG Impact Strategy goals.

Business Partner selection process and conflicts of interest

- PFG reserves the right to conduct integrity screening of our Business Partners, as part of its selection process.
- Business Partners are required to declare any potential conflict of interest prior to the start of the selection process.
- PFG reserves the right to prioritize working with business partners that have established Environmental, Social, and Governance (ESG) goals, and are aligned with our own ESG Impact Strategy and long-term aspirations. Business Partners that lack an established and integrated ESG program will receive secondary consideration based on their sustainability performance, adherence to environmental management principles, and ability to verify they share our commitment to operating sustainably and responsibly.

Anti-bribery and corruption, money laundering, competition law, and international trade sanctions

- Business Partners shall abide by all applicable anti-corruption, money laundering and competition laws.
- Business Partners shall not engage in any form of bribery or corruption in order to obtain an unfair or improper advantage.
- Business Partners shall not participate in activities which could be seen as impeding competition.

Human rights & workforce standards

- As our success moving into 2020 becomes increasingly interdependent on the welfare and prosperity of all our stakeholders, we are committed to leveraging the shared expertise, capabilities, and resources of all our stakeholders to enforce the human rights and workforce standards laid out in our policy and supported by the United Nations Compact on Human Rights.
- We expect all Business Partners to be fair, transparent, and respectful in the treatment of their employees, and expect them to hold their other business partners to these standards as well. We expect all Business Partners, subcontractors, and affiliated entities to adhere to the following key conventions of the International Labor Organization and United Nations Declaration of Human Rights:
 - Prohibit child labor, forced, or compulsory labor and human trafficking
 - Ensure compliance with applicable age, hours, and benefits laws, including minimum wage, overtime, and maximum work week laws
 - Verify the employment eligibility of employees
 - Respect the right of employees to freely associate, organize and legally bargain collectively
 - Ensure an inclusive workplace free from discrimination and harassment, based on all of the following characteristics: Race, religion, color, gender, age, sexual orientation, national origin, ethnicity, disability, marital status, pregnancy, political beliefs or any component of one's identity

Health, safety, and the environment

- Business Partners are required to abide by all local, national, and applicable international laws relating to health, safety, and the environment while conducting work for and with PFG.
- We expect adequate measures and controls are in place to protect the health and safety of their employees, their local stakeholders, and the overall community as it pertains to the company's operations and behaviors.

Food safety, quality, and regulatory compliance

- All food products must meet or exceed applicable government and contractual standards for safety and quality. All concerns or issues regarding product safety or quality must be reported immediately to PFG to ensure appropriate action can be taken to protect our customers, PFG's brand, the brands of our Business Partners, and the greater public.
- PFG will work with Business Partners to enhance their internal food safety and quality measures yet always reserves the right to terminate the relationship at PFG's discretion.

Audits and verification

- PFG reserves the right to audit compliance with the stated Business Partner Code of Conduct and ensure verification of stated claims. We will monitor and enforce this Code through a variety of audits if deemed necessary by PFG's risk management processes, including third-party verification, access to facilities and relevant records, and any additional monitoring and enforcement measures PFG deems necessary on a case-by-case basis.
- We promote and encourage all of our Business Partners to uphold the same standards and compliance measures when working with their other business partners and utilization of subcontractors.
- PFG specifically reserves the right to the following:
 - Require verification of impacts and internal controls through documentation and/or on-site visits.
 - Prioritize Business Partners that are aligned with PFG's ESG Impact Strategy and goals.
 - Reserve the right to terminate the relationship due to a lack of goodwill, adequate performance in these areas, or risk management capacity and capabilities. PFG prides itself on being a collaborative partner to all stakeholders and will utilize its capabilities, knowledge, and resources to assist our Business Partners in course correcting and implementation of needed measures and controls.

Violation of this code and corrective measures

- PFG reserves the right to terminate the relationship with any Business Partner that knowingly obstructs our Business Partner Code of Conduct.
- PFG will determine the extent of the violation on a case-by-case basis and is committed to collaborating with all Business Partners to ensure expectations are set, internal controls are established, and mutual accountability for desired outcomes is upheld.

Raising a concern

Should you have any concerns, questions, or needed clarification on PFG's Business Partner Code of Conduct or its relevance to your specific business, please speak directly to your contact at PFG. If preferring to report a concern confidentially, please use the contact information below to utilize our anonymous reporting tool:

- Call (toll free): 1-800-800-1827
- Visit: pfgc.com/speakup
- Email: ethics.matter@pfgc.com.