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# WE'RE COUNTING ON YOU

It's incredible to think that Performance Food Group has been serving our associates, customers, and communities since 1885—and we've never stopped. Performance Food Group Company and its subsidiaries (together, "PFG" or the "Company") have continued to innovate, adapt, and grow into a trusted leader in the foodservice industry. That success is thanks to the dedication of countless PFG associates who have helped our customers thrive.

As part of the PFG family, we've inherited a strong legacy—and a responsibility to uphold it. We do that by working together, living our values, and putting **Integrity in Action**. That starts with understanding and following our **Code of Conduct**.

The Code is our guide. It helps us make the right choices, act with integrity, and represent the culture we've built. It applies to all PFG associates—officers, directors, and employees—and sets the high standards we hold ourselves to. We count on you to read the Code carefully, follow it, and speak up if you see conduct that may violate it, the law, or our policies. If you have questions, use the resources listed in the Code to get help.

No matter what your role is or where you work, you're part of PFG's ongoing story. Every delivery, every satisfied customer, and every success starts with associates like you. With your help, we'll keep inspiring trust for generations to come.

Scott McPherson  
**President and Chief Executive Officer**

# What We Do and Don't Do

## We Do

**Show Respect:** Treat everyone—customers, colleagues, suppliers, and the public—with dignity. Recognize and report harassment, intimidation, or discrimination.

**Champion Fairness:** Make employment decisions based on skills and qualifications, not personal characteristics or biases. Encourage equal opportunity and speak up against discrimination.

**Keep the Workplace Safe:** Follow all safety rules, wear required protective equipment, and report hazards, injuries, or unsafe behavior immediately.

**Protect Company Assets:** Use company resources responsibly and only for legitimate business purposes. Safeguard physical, technological, and information assets.

**Safeguard Confidential Information:** Keep company, customer, and partner information secure. Only share confidential data with those who need it for work.

**Protect Personal Information:** Handle personal data carefully, use it only for legitimate business purposes, and follow privacy laws and company policies.

**Maintain Accurate Records:** Ensure business records are truthful, complete, and stored securely. Comply with legal holds and get proper approvals for transactions.

**Use AI Responsibly:** Use AI tools only if they are approved by PFG. Always review AI outputs for accuracy and consistency with PFG values.

**Avoid Conflicts of Interest:** Put PFG first in all business decisions. Disclose any potential conflicts to the Legal Department.

**Report Concerns:** Speak up immediately if you see or suspect violations of the Code, policies, or law. Use available reporting channels and cooperate with investigations.

**Build Strong Partnerships:** Choose business partners who share PFG's commitment to integrity and document relationships properly.

**Compete Fairly:** Follow antitrust and competition laws. Avoid improper agreements or sharing confidential information with competitors.

## We Don't

**Don't Discriminate or Harass:** Never base decisions on personal characteristics or tolerate harassment, intimidation, or unfair treatment.

**Don't Ignore Safety:** Never take shortcuts or ignore safety procedures. Don't possess, use, or be under the influence of drugs or alcohol at work.

**Don't Misuse Company Assets:** Don't use company resources for personal gain, illegal activities, or in ways that violate company policies.

**Don't Share Confidential Information Improperly:** Never disclose confidential or personal information outside PFG unless authorized.

**Don't Falsify Records:** Never hide, alter, or misrepresent business or financial records.

**Don't Use AI Irresponsibly:** Never input confidential or personal information into unapproved AI tools. Never use AI tools for employment-related decisions or other high-risk decisions without the required approvals.

**Don't Engage in Bribery or Kickbacks:** Never offer, accept, or request bribes, kickbacks, or inappropriate gifts. Always follow PFG's policies for gifts and entertainment.

**Don't Trade on Insider Information:** Never buy or sell securities or provide any "tips" based on material, nonpublic information.

**Don't Mix Personal and Company Political Activities:** Don't use PFG resources for personal political activities or make contributions on behalf of PFG without the required approvals.

**Don't Retaliate:** Never retaliate against anyone who reports concerns or participates in investigations in good faith.



## OUR CODE

Our Code paints a picture of PFG, showing what we care about as a company, what we're committed to and what's expected of each of us. Following the Code also shows us where we can go—toward an exciting and ethical future together.

- [We Follow the Code](#)
- [We Know What Is Expected of Us](#)
- [We Make Good Decisions](#)
- [We Speak Up](#)

# We Follow the Code

At PFG, we do important work. From independent restaurants and national chains to vending, concession, convenience and more, we can meet nearly any customer need and provide almost any product. That's a big responsibility. PFG associates are the key to our success and the reason our customers continue to thrive.

It takes passion and drive to keep our trucks moving and our facilities running. Our culture inspires us to make customers happy. Our Code helps us go further. It guides us through ethical situations and helps us make choices that reflect who we are as a company.

## Look to the Code for ...



- Explanations of common ethical topics
- Definitions of key terms
- Answers to frequently asked questions
- Links to PFG policies and resources
- Decision-making aids
- Additional resources when you need more help



## How should I use the Code?

Business is built on decisions. Each choice builds or breaks trust and moves us forward—or backward—as a company. The Code is your guide for making the best decisions for yourself, PFG and those we serve.

Read the Code carefully to understand what’s expected of you and how to live our culture in your work. Use it whenever you have a question or face a tricky ethical situation. If the Code doesn’t have the answer, it will point you to other resources for help.

### It’s Up to You



When it comes to the Code:

- Read it.
- Make sure you understand it.
- Ask questions if something isn’t clear.
- Commit to following it.

## Who follows the Code?

If you work for PFG in any way, this Code applies to you. Every PFG associate, and anyone else who works on our behalf, is expected to understand and follow our Code—including our leadership team, Board of Directors and associates working in PFG facilities or remotely. No one at PFG is exempt.

Our suppliers, vendors and other business partners are expected to uphold our [Business Partner Code of Conduct](#).

## What about violations?





Violation of any PFG policy also violates our Code—and the trust we share with each other and our customers. That’s why violations are taken seriously and may lead to disciplinary action, up to and including termination of employment. If the violation also breaks the law, it could result in civil or criminal penalties.







# We Know What Is Expected of Us

In the short run, talent may win the game, but teamwork and shared responsibility build a legacy. Each of us impacts PFG’s reputation and our future when we recognize and fulfill our responsibilities.

## The responsibilities we all share:

|   |  |
|---|--|
|  <b>Deliver</b>                                    |  <b>Comply</b>  |
| <p>It’s our daily mindset—delivering the goods through hard work, ingenuity and living and sharing our culture in every action.</p> | <p>No matter where you’re working, know and follow our Code, along with our policies and any laws that apply. <u>Ask questions</u> when something isn’t clear.</p> |
|  <b>Report</b>                                     |  <b>Cooperate</b>   |
| <p><u>Speak up</u> immediately if you suspect a violation of our Code, policies or the law.</p>                                     | <p>If we ask you to help with an investigation or audit, cooperate fully and honestly.</p>   |

## Our leaders’ responsibilities:

|   |   |
|---|---|
|  <b>Model</b>                      |  <b>Guide</b>                          |
| <p>Be a living example of our culture in everything you do and say and expect the same from your team.</p>            | <p>Know our Code and policies so well that you can guide others to the right answers or the right resources for help.</p> |
|  <b>Communicate</b>                |  <b>Act</b>                            |
| <p>Be open and available when your team needs to talk. Create a safe and comfortable environment for speaking up.</p> | <p>Listen carefully to all concerns, and when necessary, take action by speaking up.</p>                                  |



## Food for Thought

**Someone on my team came to me with a suspicion of misconduct in our area. I think I could confirm whether or not this activity is happening with a little investigation. Should I dig deeper or should I report what I know so far?**



You should definitely report what you’ve learned immediately. There’s no need to have all the details or to confirm misconduct before reporting it. What’s important is speaking up early so PFG can quickly take appropriate action.

# We Make Good Decisions

Life is full of twists and turns, and it's not always clear which path to take. Running a business is the same. Every decision—big or small—steers us along the way. We trust you to make good choices, even when the right answer isn't clear.



Check the Code first, then ask yourself:

**Is what I'm considering ...**

**Legal?**

**Reflective of our culture and values?**

**Aligned with our Code and policies?**

**Good for PFG and our customers?**

**Something I'd be proud to share with others?**

If you can answer "yes" to each of these questions, the action is probably OK. Any "no" or "I'm not sure" answers are a sign to stop and **ask for help**.

# We Speak Up

Once you know and commit to our Code, you're well on your way to putting Integrity in Action. You'll also know what kind of activity may violate our Code, policies or the law.

## When to speak up

If you see or suspect a violation of the Code, speak up right away. You don't need all the details—just let us know as soon as possible so we can respond quickly and appropriately. Not reporting a known or suspected violation is also a breach of the Code and may lead to disciplinary action.

## How to speak up

We offer a variety of ways to speak up. Reach out to any of these resources:

- Your manager
- Your Human Resources representative
- Any member of management
- The [Legal Department](#)

Or, if you prefer, you may contact:

The EthicsPoint Hotline  
 Call 1-800-800-1827  
 Visit [pfgc.com/speakup](http://pfgc.com/speakup)  
 Email [ethics.matter@pfgc.com](mailto:ethics.matter@pfgc.com)

This service is available 24 hours a day, seven days a week and is operated by an independent third-party provider. An operator or online web form documents your concern and forwards it to the appropriate PFG resource. You may report anonymously; however, we encourage (but do not require) you to provide your name in case we have additional questions or need further information to support the investigation.

### Did you know?



If you wish to register any complaint to the Audit and Finance Committee of the Board of Directors regarding accounting, internal accounting controls or auditing matters, or deliver an anonymous submission of such concerns, you may address it to the following:

Chairman of the Audit and Finance Committee  
 Performance Food Group Company  
 12500 West Creek Parkway  
 Richmond, VA 23238

## Then what happens?

Regardless of which reporting option you choose:

- PFG will take your report seriously.
- If it's necessary, we will promptly conduct a thorough investigation. We will keep your report as confidential as we legally can and protect the rights of anyone involved.
- In case of an investigation or audit (whether internal or external), we require you to cooperate honestly and completely.
- If an investigation shows that a violation has occurred, we'll take appropriate action.

## We don't retaliate

Speaking up takes courage—especially if you're worried about retaliation. That's why we strictly forbid any negative treatment of anyone who reports a concern in good faith or helps with an investigation, even if the concern can't be confirmed.

Retaliation has no place at PFG. It goes against our values, our policies and our Code.

Watch for signs of retaliation, including:

- Dismissal or the threat of dismissal
- Demotion or reduced responsibilities
- Reduced pay
- Denied opportunities
- Isolation or exclusion from activities
- Threats of any of the above

If you have seen or experienced possible retaliation, don't ignore it. [Speak up](#) immediately.

### Reporting in "good faith" means ...

Reporting something you sincerely believe to be true—even if you don't have all of the details.

### It doesn't mean ...

Reporting something you know to be false or making a malicious report.



## Food for Thought



**My manager asked me to do something that I believe violates our policies and then, if I had a problem with it, dared me to report it. I'm afraid of being fired if I report it. Should I just let this go?**

No, you shouldn't. Your manager has violated our Code by asking you to do something that you, in good faith, believe violates our policies. Ignoring misconduct or waiting to see what happens is not an option. Remember your responsibility to speak up. We won't tolerate retaliation of any kind against you for speaking up— regardless of who is involved. Speak up to any resource listed in the Code.



### Dig In

Whistleblower Policy



## OUR PEOPLE

We know we wouldn't get far without each other. At PFG, we find strength both in our unity and in our differences. Every day, we treat each other with care, respecting one another and celebrating everyone's unique contributions.

- [We Champion a Culture Where Everyone Thrives](#)
  - [Employment Practices](#)
  - [Our Commitment to Non-discrimination](#)
- [We Show Respect](#)
- [We Keep Our Workplace Safe and Healthy](#)

# We Champion a Culture Where Everyone Thrives

## All are welcome at PFG

By building teams with a wide range of backgrounds and experiences and welcoming fresh perspectives, we all benefit and create a more innovative and positive company.

## Do What's Right

### Employment Practices

**Practice fairness in employment decisions.** If you make decisions that affect someone's work (like recruitment, hiring, promotions or dismissals), know and follow all laws that apply.

Ask questions if any law or requirement is unclear.

**Help encourage access and opportunity.** Whether you hire, manage or collaborate with others, help ensure that every individual has the same chance to succeed at PFG, including having equal opportunities to contribute and access resources.

## Our Commitment to Non-discrimination

**Be a model of fairness.** In every interaction you have, treat others fairly and respectfully. Never discriminate against anyone (or show favoritism) based on your personal biases or their personal characteristics.

**Seek a variety of perspectives.** When working as a team, include input from all sources, especially those who are new to you. Give everyone the chance to be heard and participate.

**Take a stand.** If you become aware of discriminatory, disrespectful or unfair treatment in any part of our business, Speak Up about it immediately.

### It's Up to You

#### Only base employment decisions on ...

Skills, qualifications and job requirements

#### Never base them on ...

Personal characteristics or biases (whether conscious or unconscious)



### Did you know?



Certain characteristics are protected by law, including but not limited to:

- Race
- Color
- Religion
- Sex
- Gender expression or identity
- National origin
- Age
- Disability
- Genetic information
- Veteran status
- Marital or family status



### Food for Thought



**I suspect that my colleague eliminated a potential job applicant from consideration due to the individual's national origin. Since this person isn't a PFG employee, should I just let this go?**

No, you shouldn't. Discrimination can happen anywhere in our business, including in the way we screen and select new hires. We need to know about this. To make sure we're being fair and following the law, [speak up](#) about your concerns immediately.

**I believe my manager is playing favorites with job assignments and other opportunities. One employee on our team always seems to benefit. What should I do?**

You should tell your manager in clear terms that you feel you have not been treated fairly and give specific examples of what you believe to be discriminatory conduct. If you feel your manager isn't responding fairly to your concerns, speak up immediately.



#### Dig In

- Equal Employment Opportunity Policy
- Unlawful Discrimination, Harassment and Retaliation Policy
- [Enterprise Human Rights Policy](#)

# We Show Respect

## Kindness works here

We're not a team simply because we work together—it's because we value and respect one another. At PFG, we're committed to maintaining a positive and productive environment that's free from harmful and abusive behavior.

## Do What's Right

**Be respectful.** Whether you're interacting with customers, suppliers, business partners or the public, treat everyone with respect.

**Be able to recognize harassment.** Harassment can be verbal, physical or sexual in nature. It creates a negative or intimidating environment and affects a person's ability to do their job.

**Don't look the other way.** If you see or suspect harassment, intimidation, [discrimination](#) or other inappropriate conduct (no matter who might be involved), [speak up](#) immediately.

## It's Up to You

### Learn to spot harassment, which may involve:

- Inappropriate physical contact, gestures or sexual advances
- Derogatory jokes, names, comments or intimidation
- Sexual requests—including as a condition of employment
- Posting, emailing or sharing of offensive or sexual material
- Jokes or comments about gender identity, sexual orientation or any personal characteristic
- Repeated insults, threats or coercion

If you're not sure if behavior is harassment, [ask for guidance](#).



### Dig In

Unlawful Discrimination, Harassment and Retaliation Policy

[Enterprise Human Rights Policy](#)



# We Keep Our Workplace Safe and Healthy

## A safer way, every day

At PFG, your safety and well-being come first—no compromises. We want every associate to go home safe and sound each day. We can achieve that goal when each of us fully commits to working responsibly and safely—no excuses and no exceptions.

## Do What's Right

**Follow all safety rules.** Know the rules and follow them exactly, including your facility's emergency preparedness plans and procedures. Always wear the right personal protective equipment, take required safety training, and only do work you are qualified and trained to perform. Make sure all third parties and visitors follow PFG's safety rules, too.

**Be fit to work.** Never possess, distribute, use or be under the influence of alcohol or drugs—legal or illegal—while on Company property, using Company equipment or vehicles, or doing Company business. If alcohol is served at Company events or other business events, act responsibly and follow the law.

# Stay Safe

*Please adhere to the following guidelines to enjoy a safer and healthier workplace!*



### SECURITY BADGES

Please remember to have your security badge with you at all times and do not allow individuals to follow you into the facility.



### PERSONAL PROTECTIVE EQUIPMENT

To help ensure associate safety, please remember to have your personal protective equipment with you at all times.

- Safety Shoes
- Safety Vest
- Gloves
- Coat or Jacket as needed
- Scanning Equipment
- Trip Check List

## NOT PERMITTED



### Firearms or weapons

Firearms and concealed weapons are prohibited on PFG property. This includes firearms left in associate vehicles if parked on PFG property unless otherwise allowed by state law.



### Threats of violence

Acts of intimidation, threats, and violence are strictly prohibited. Such actions may result in disciplinary measures—up to and including termination.



### Horseplay

Our facilities and warehouses are busy places and can be dangerous if safety protocols are not followed. Please refrain from activities that could put associate safety in jeopardy.



### Illegal drugs & alcohol

Misuse of alcohol and drugs is prohibited.



### Tobacco

Use of tobacco products is prohibited in PFG facilities and should only be used in company designated smoking areas.

## IF YOU SEE SOMETHING, SAY SOMETHING

Always report acts of violence, threats and suspicious activities to your manager and/or HR representative, or contact the "Speak Up" hotline at

**800-800-1827**



**Keep violence out.** We do not allow any threats, violence, or weapons of any kind on PFG property. Watch for warning signs like aggressive behavior, threats or property damage.

**See something? Say something.** Immediately report any potential safety hazards, accidents, injuries, illnesses, malfunctioning equipment, weapons, signs of violence or violations of our safety rules. [Speak up](#) about any concerns you have immediately—you might save a life.

### Food for Thought



**I'm new to PFG and just received training on a piece of equipment. A more senior colleague suggested a "shortcut" that seems to violate the safety procedures I just learned. Since this person is more experienced than I am, should I take the suggestion?**

No, you shouldn't. You or someone else could get hurt. Let your colleague know that this suggestion goes against our safety procedures. If your colleague dismisses your concerns, speak immediately with your manager to help prevent an accident.



#### Dig In

Safety and Health Policy

[Enterprise Human Rights Policy](#)

Safety Manual





# OUR ASSETS AND INFORMATION

Building a business like ours takes generations of hard work, passionate people and a variety of valuable resources. We keep growing and delivering excellence by protecting the assets and information that make us unique and competitive.

- [We Use Our Assets Responsibly](#)
- [We Protect Company Information](#)
  - [Confidential Information](#)
  - [Intellectual Property](#)
- [We Protect Personal Information](#)
- [We Manage Our Records Properly](#)
- [We Use Artificial Intelligence Responsibly](#)

# We Use Our Assets Responsibly

## Take pride and take care

As PFG team members, we're all responsible for protecting Company assets by using them responsibly and preventing damage, loss or misuse.

## Do What's Right

**Treat our assets with care.** PFG entrusts you with valuable assets to do your job. Use them only for legitimate business purposes and protect them from theft, loss, waste and abuse. Personal use of PFG assets must not:

- Involve anything illegal or improper, including for personal gain
- Be excessive (as determined in the sole discretion of the Company)
- Create any material cost to the Company
- Violate any Company policies or practices

Remember, PFG may access and review all communications, records and information created at work or with PFG resources.

**Stay secure.** Follow our information technology use and related policies carefully to prevent unauthorized access to our facilities or [information](#). Adopt good cybersecurity habits: update passwords, secure devices and never click suspicious links or install unauthorized software. [Speak up](#) immediately about any theft, fraud or misuse of PFG assets.

**Work responsibly—wherever you are.** Whether you're working in a PFG facility, at home or elsewhere, the same rules apply. Be professional, on time, respectful and protective of our information and assets.

| What to protect:   |   |  |
|--|---|--|
| Physical assets  | Technology assets   | Information assets   |
| The tangible things you can see, such as:<br><br>Facilities and furniture<br>Equipment and tools<br>PFG vehicles<br>Office supplies<br>Company credit cards<br>Hard copy records and documents | The tools supporting our networks and systems, such as:<br><br>Computer hardware<br>Software<br>Internet access<br>Networks and databases<br>Mobile devices | Information we create or gather that's valuable to us or otherwise subject to privacy or data protection laws, such as:<br><br>Innovation and ideas<br><a href="#">Intellectual property</a><br><a href="#">Confidential information</a><br><a href="#">Personal information</a><br>Trade secrets<br>Emails and other electronic records<br>Logos and trademarks |



### Dig In

- Acceptable Use Policy
- Information Security Policy

# We Protect Company Information

## Secrets are safe with us

At PFG, our ideas and information make us unique and competitive. We all must protect confidential information and intellectual property from misuse and unauthorized access

## Do What's Right

### Confidential Information

**Keep it secret.** Confidential information includes nonpublic information about our Company, customers, suppliers or business partners that is not meant to be shared. Disclosing it (either accidentally or purposely) could cause harm or break the law. If your role gives you access to confidential information (including [personal information](#)), you must:

- Share it only with other PFG associates who need to know it for work.
- [Never share it with anyone outside PFG](#) unless the disclosure is allowed by Company policy or you have received prior written approval from the [Legal Department](#).



## Intellectual Property

**Be a good guardian.** Intellectual property (“IP”) is something we create, like innovations and information unique to PFG. IP can also be created and owned by third parties and licensed to PFG for specific uses. Whether the IP is owned by PFG or a third party, it’s your responsibility to keep it secure. Never use IP in an unauthorized way and never share IP with anyone who isn’t authorized to see it. See [We Use Our Assets Responsibly](#) to learn more.

### Confidential information can include ...

- Acquisition or investment plans
- Research
- Projected sales or earnings
- Personally identifiable information
- Associate, customer or business partner lists
- Special terms or discounts offered to customers
- Pricing information
- Purchasing information



### Intellectual property can include ...

- Trademarks, copyrights and patents
- Trade secrets (which may include formulas, designs or processes)
- Marketing or strategic plans
- Branding and logos
- Copyrighted material or content
- Proprietary software or other proprietary materials (whether owned by PFG or licensed to PFG by a third party)

**Take action.** If you’re aware of a possible misuse or unauthorized disclosure of confidential information or intellectual property, [speak up](#) immediately.

## Food for Thought



**I went out to lunch with several colleagues, and our conversation turned to an upcoming acquisition PFG is making. This information hasn’t been made public yet, but we figured nobody at the restaurant would be interested in our discussion. Was this conversation OK?**

No, it wasn’t. Your responsibility with confidential information means never discussing it publicly in any setting—even if you think nobody is listening. Disclosing this information could violate the law and/or harm our Company and our reputation.



### Dig In

- Confidentiality and Non-Solicitation of Associates Policy (Reg)
- Confidentiality and Non-Solicitation of Associates Policy (CA)
- Data Classification Policy
- Information Security Policy



# We Protect Personal Information

## If it's private, it's protected

When we're entrusted with personal information from PFG's customers, suppliers, business partners, associates, job applicants or anyone else, we make sure it's properly protected and secured.

## Do What's Right

**Know what to protect.** Whether we're gathering, storing or handling personal information, we do our part to protect it from possible misuse, loss or unauthorized disclosure.



### Information is personal when ...



It can be used to identify someone.

Personal information includes but is not limited to:

- Name, address, phone number or email
- Date of birth
- Social Security number
- Banking or credit card information
- Location data
- Health information
- Driver's license information
- Biometric information
- Geolocation
- IP address

### It comes to us from ...

Any number of individuals and entities—from those we work with to those we serve, including:

- Associates
- Customers
- Business partners
- Contractors
- Suppliers
- Vendors
- Job applicants

**Keep private information private.** If you handle personal information of PFG job applicants, associates, directors or contractors as part of your job, you must:

- Only use it for legitimate business purposes.
- Only gather the information you need for the job.
- Never discuss personal information in public or share it with anyone who has no business need to know.
- Only access it on secure networks.
- Never leave it exposed.
- Never send it to unattended printers or devices.
- Follow our policies to dispose of it properly.

In addition, if any of those individuals are California residents, you may use and disclose that information only as permitted by our CCPA Disclosure. If your job requires you to handle personal information that relates to users of PFG’s websites, you may use and disclose it only as permitted by the PFG privacy policies posted on the applicable PFG website.

Know how state, federal and international privacy laws affect you and follow them carefully, along with our policies. If any rule is unclear, contact the [Legal Department](#) for guidance.

If you suspect an improper disclosure of personal information, take action. [Speak up](#) immediately so we can minimize any harm.

## Food for Thought



**I received a request from one of our vendors for a list of associates and their contact information to send them a holiday greeting. Since this is a trusted vendor, would it be OK to provide the list?**

No, it wouldn’t. Our associates have the right to determine how their personal information is used. Even though this is a trusted vendor, our associates have not agreed to share their personal information with them, and you may not share it without proper approval.

**I was working remotely in a coffee shop today, accessing some personal contact information for several customers and sharing it via email. Since I wasn’t there for very long and was only accessing the data I needed to do my work, was this OK?**

Personal data must be stored only on Company-issued devices, Company databases or authorized third-party hosted service and must be encrypted prior to being transmitted via email. Even then, accessing personal information in a public location is risky, as someone nearby could see the information on your screen. Follow our Data Classification and Information Security Policies to keep personal information secure.



### Dig In

- CCPA Disclosure
- Data Classification Policy
- Information Security Policy

# We Manage Our Records Properly

## Keeping critical information within reach

Properly storing and tracking information helps us work efficiently and plan ahead. We rely on you to handle every business record responsibly and to keep track of our vital information.

## Do What's Right

**Manage records with care.** We rely on our business records to meet our legal requirements.

Make sure our business records are:

- Easily retrievable
- Accurate and complete
- Stored, secured, and disposed of in accordance with PFG's Records and Information Management Policy

### What are business records?

Some examples include:

- Invoices
- Expense reports
- Time records
- Performance reviews
- Emails and other communications
- Contracts
- Bids and proposals



**Comply with legal holds.** The Legal Department may ask you to keep certain records, information or other materials relevant to litigation or an audit or investigation. Don't alter, delete or destroy information or materials that are under a legal hold; you must retain and preserve them until the Legal Department tells you it is no longer necessary.

Contact the [Legal Department](#) if you have questions about how to handle our records.

**Get the right approvals for financial transactions.** PFG has certain requirements for approval authority related to the Company's operating expenses, payments, contracts and other transactions. Only authorized associates may approve contracts, purchases, payments and other transactions under PFG's Financial Authority Policy. All transactions and agreements between PFG and any third party must be compliant with this Policy.

**If you see something, say something.** Don't ignore questionable activity or practices involving our records. [Speak up](#) immediately.



### Dig In

- Records and Information Management Policy
- Financial Authority Policy

# We Use Artificial Intelligence Responsibly

## Automate with oversight

AI can improve how we work, but its use also comes with important responsibilities. When using AI for PFG work, we must protect our business, our people and our business partners.

## Do What's Right

**Innovate with integrity.** If you're authorized to use, design or develop AI tools as part of your work for PFG, you must comply with the Artificial Intelligence Addendum to PFG's Acceptable Use Policy and all other PFG policies and applicable laws. Only use AI tools that have been approved in advance by PFG. Only use devices that are issued or managed by PFG to access AI tools for PFG work. And if a customer, job applicant or other user will be interacting with an AI tool, be transparent and let them know.

**Keep confidential information out.** Information is fuel for AI. It feeds on it, learns from it and shares it with others. Never enter any confidential information, intellectual property or personal information into any AI tool unless it is designated "Approved Without Restrictions" on Information Security's Approved AI Technology List.

**Monitor AI outputs.** Not all AI outputs are reliable. They can be inaccurate, inconsistent with our principles or even biased or discriminatory. Before using or sharing any AI content, check it (with human oversight) to ensure completeness, accuracy and consistency with PFG values.

**Get prior approval for high-risk AI use.** Some AI uses require additional review and approval. These include using AI as a factor in making (1) employment decisions (e.g., hiring, performance evaluations); and (2) credit or financial decisions about customers or other business partners. These types of AI uses are considered "high risk" and must receive prior approval from Legal, Information Security, and others.



### Dig In

Acceptable Use Policy – Artificial Intelligence Addendum





# OUR BUSINESS PRACTICES

Our Company is what we make it. We're proud of PFG and the way we do business. Each day we demonstrate that pride by doing what's right and building our reputation on integrity and honesty in every transaction and interaction.

- [We Avoid Conflicts of Interest](#)
- [We Ensure Financial Integrity](#)
  - [Accounting Principles and Public Disclosures](#)
  - [Business Records](#)
  - [Transaction Approvals](#)
  - [Fraud and Theft](#)
- [We Are Committed to Food Safety and Quality](#)
- [We Communicate Responsibly](#)
  - [Speaking as a Company](#)
  - [Posting on Social Media](#)

# We Avoid Conflicts of Interest

## Our Company comes first

Every choice we make impacts PFG. We put our Company first by avoiding and disclosing possible conflicts of interest.

## Do What's Right

**Check your choices.** It's okay to have interests outside of work, but those interests must not influence your judgment when working for PFG. A conflict of interest exists when a personal interest could interfere with – or appear to interfere with – your obligations to the Company. Every business decision you make must be in PFG's best interest and not motivated by personal gain.

**Know what to avoid.** Conflicts of interest can come in unexpected forms and may be difficult to spot. Some common examples include:

- Engaging in outside work that might (at PFG's sole determination) interfere with your ability to fulfill your responsibilities to the Company or your objectivity and independence in carrying out those duties.
- Doing paid or unpaid work for or engaging in other business activities with a competitor or for any of PFG's present or potential business partners, suppliers, vendors or customers.
- Offering, requesting or accepting improper gifts or entertainment.
- Managing family members or anyone with whom you have or had a close personal relationship or being in a position to make employment decisions that affect them.

- Authorizing a family member's employment with PFG or using your position (directly or indirectly) to obtain a job at PFG for a family member. Prohibited acts include recommending or "putting in a good word" for a family member for a job, participating in discussions about the family member's job application, or requesting an interview or job for a family member.
- Acting on behalf of PFG in any transaction with a PFG supplier, vendor, customer or business partner when you, your family member or anyone with whom you have had a close personal relationship:
  - Is employed by any of these parties
  - Has a financial interest in the transaction
- Accepting a position on the board of a PFG competitor, customer, vendor, supplier or business partner (whether public or private) without the prior approval of the Company's Compliance Committee. If you are member of the Compliance Committee, you must obtain prior approval from PFG's CEO and the Lead Director of the Company's Board of Directors.
- Using your position at PFG to personally gain from Company property, information, resources, associates or business opportunities.

## It's Up to You

### Is this a conflict of interest? Ask yourself:

- Could this situation influence my decisions at PFG?
- Will it get in the way of my regular work duties?
- Does it involve any of my family or friends?
- Is it good for me but not for PFG?
- Could someone looking at this think it's a conflict or that my judgment might be impaired?
- Could this damage our reputation?



Any "yes" or "maybe" answers are signs of a possible conflict of interest. Disclose the situation immediately.

**When in doubt, disclose it.** If you have a conflict of interest, or aren't sure if something might be conflict, disclose it immediately to the Legal Department by [speaking up](#). In many cases, a conflict can be resolved or appropriately managed by taking the right action, as advised by Legal and, where applicable, the Company's Compliance Committee. Having a conflict isn't a Code violation, but failing to disclose a conflict is. Don't move forward without approval from the [Legal Department](#) or the Company's Compliance Committee.

### Food for Thought

**My spouse recently got a new job with one of our suppliers. Since we work in different areas and wouldn't have contact with each other, do I have to disclose this?**



Yes, you must disclose this situation to the Legal Department. That way, we're better prepared to address the potential conflict before it causes harm.



# We Ensure Financial Integrity

## Our records are rock solid

PFG’s records reflect our financial and organizational health and help us plan for the future. That’s why accuracy and completeness are essential.

## Do What’s Right

### Accounting Principles and Public Disclosures

**Follow financial accounting principles and public disclosure requirements.** Follow all laws, generally accepted accounting principles, and Company internal controls and accounting policies to ensure our records are complete and accurate.

#### What is financial integrity?

It’s being ethical and responsible in our recordkeeping—making sure records are complete, accurate and timely.



### Specifically, you are responsible for:

1. Honest, accurate, clear and timely recording, reporting and retention of information.
2. Accurately reflecting all transactions and events in all financial books, records and accounts.
3. Recording all expenses, revenue, assets and liabilities in the proper accounting period.
4. Full, fair, accurate, timely and understandable disclosure in the Company’s financial statements and other disclosure documents that the Company provides to its shareholders, lenders, noteholders or other potential investors.
5. Complying with all applicable disclosure requirements and generally accepted accounting principles.
6. Maintaining an adequate internal control structure and procedures for financial reporting.
7. Certifying, to the best of your knowledge, that accounting entries or financial transactions fairly represent the Company’s financial condition and results of operations, as outlined and requested by the Chief Accounting Officer or Chief Financial Officer.
8. Maintaining the confidentiality of material, nonpublic Company information.



**You must never:**

1. Hide, disguise or misrepresent the true nature of any transaction.
2. Alter, destroy, conceal or falsify the Company’s financial records for any purpose, including but not limited to causing those records to be incorrect, misleading or unavailable for use in an official proceeding.
3. Provide false, incomplete or misleading information to an internal or external auditor.
4. Fraudulently influence, coerce, manipulate or mislead an auditor of the Company’s financial statements for any purpose, including but not limited to rendering those financial statements.
5. Defer the recording of items that should be expensed within the proper accounting period.
6. Maintain undisclosed or unrecorded funds, assets, liabilities or contingencies.
7. Make or approve a payment with the intention that it is to be used for any purpose other than that described by the documents supporting the payment.
8. Disclose, or trade while in the possession of, material, nonpublic Company information.

**Business Records**

**Maintain truthful, accurate and complete business records.**

Our records support PFG’s operational activities. We must ensure they’re reliable, accurate, up to date and retained in accordance with PFG’s Records and Information Management Policy.

**Transaction Approvals**

**Get proper approvals for financial transactions.** All transactions and agreements between PFG and any third party must comply with PFG’s Financial Authority Policy. Additional requirements apply for transactions and interactions involving government officials, including foreign officials. For example, prior to paying or authorizing a payment to a foreign official, you must consult with the Legal Department and obtain approval from the Compliance Committee and, when appropriate, from foreign government entities. Please refer to PFG’s Global Anti-Corruption Compliance Policy for additional requirements that apply to PFG’s internal record-keeping and financial reporting and controls when government officials (either domestic or foreign) are involved.



## Fraud and Theft

**If you see something, say something.** We all have a duty to ensure that our work environment is free from fraud and theft. “Fraud” is any activity that relies on deception to achieve a gain. Any fraudulent activity or theft is grounds for disciplinary action, up to and including termination, and may result in criminal prosecution. If you become aware of or suspect any theft or fraudulent activity, report it immediately by contacting:

The EthicsPoint Hotline

Call 1-800-800-1827

Visit [pfgc.com/speakup](https://pfgc.com/speakup)

Email [ethics.matter@pfgc.com](mailto:ethics.matter@pfgc.com)

Or email Internal Audit at [internal.audit@pfgc.com](mailto:internal.audit@pfgc.com)

The [Legal Department’s](#) prior approval is required for any agreements with associates that relate to repayment for fraud or theft.



## Food for Thought



**My manager has asked me to delay sending an invoice to Accounts Payable until next quarter. I assume it’s to give us some leeway to meet our budget. Should I follow this request?**

No—the costs associated with all goods and services must be accounted for in the period they were incurred. Because your manager is asking you to create an inaccurate record, you should [speak up](#) and report the situation immediately.

**While reviewing our monthly invoices, I noticed that we slightly overbilled a customer. Since the bill was reasonable, the customer paid it without question. Because it’s a small amount, I doubt anyone will notice the discrepancy. Should I notify anyone?**

Yes, you should. Immediately notify your manager so the overpayment can be corrected. It doesn’t matter how small the error may be or whether it might be discovered. What’s most important is that we act with integrity in all situations involving our customers.



### Dig In

Records and Information Management Policy

Global Anti-Corruption Compliance Policy

Financial Authority Policy

Securities (Insider) Trading Policy

# We Are Committed to Food Safety and Quality

## Nothing less than the very best

Our customers expect the best from PFG, and that is what we always aim to provide: products that meet safety regulations and our high quality standards. The result? Outstanding flavor and function in every product and every menu.

## Do What's Right

**Maintain high standards.** At PFG, we are committed to the highest standards of product quality and safety. This commitment is a shared responsibility and daily focus for all PFG associates. Every associate is properly trained and empowered to follow the quality and safety procedures applicable to their role at the Company, including standards required by law and by the PFG Quality Assurance Department.

**Require total commitment from our partners.** Everyone in the PFG supply chain plays a role in ensuring product quality and safety. PFG requires full commitment to quality and safety from all suppliers and business partners.

**Be responsive.** Product quality and safety concerns reflect directly PFG and can impact customer trust. Take all concerns seriously and help PFG address them quickly and respectfully to ensure we consistently meet expectations.

**Say something.** Food quality and safety is everyone's responsibility. If you see someone failing to uphold our quality or safety standards, or if a product fails to meet applicable specifications, share your concerns immediately with your manager or another [PFG resource](#).

### To ensure quality and safety ...

- Follow all quality and safety programs and procedures to the letter.
- Never take shortcuts or make exceptions involving product quality or safety.
- Accurately document all activities.
- Never allow products to leave our control without meeting PFG standards.



# We Communicate Responsibly

## Words: Handle with care

Our words have the power to help or harm PFG and the people around us, so we communicate responsibly, as both individuals and as a company.

## Do What's Right

### Speaking as a Company

**Let PFG speak for itself.** The messages we send must be consistent and carefully crafted—never conflicting, misleading or in violation of the law. Unless you're authorized, never speak for PFG or give the impression that you do.

#### When does communication matter most?



Communicating well is always important, but especially in your:

- Phone or in-person conversations
- Emails, texts or chats
- Collaborations with others
- [Networking activities](#)
- [Sales and marketing activities](#)

**Refer investor and media requests.** If you're ever contacted by an investor or a member of the media looking for a comment or information, don't respond. Instead:

| If the inquiry came from ...                                 | Refer it to ...   |
|--|---|
| An investor, stockholder, broker or other market participant | <a href="#">Investor Relations</a> or another authorized PFG spokesperson, in compliance with PFG's Regulation FD Compliance Policy |
| A member of the media  | <a href="#">PFG's Corporate Communications Department</a> in compliance with PFG's Media Relations Policy                           |

### It's Up to You

#### Use social media responsibly:



- Don't post anything that states or implies that your views are representative of PFG.
- Don't post anything offensive, harassing, discriminatory or illegal.
- Don't post anything that violates our culture or policies.
- Don't share information that's:
  - [Private](#)
  - [Confidential](#)
  - [Intellectual property](#)
  - [Nonpublic](#)

## Posting on Social Media

**Share with care.** Be respectful and responsible when using social media and always follow our Social Media Policy. Never claim to represent PFG or post anything that could harm someone, including our customers, suppliers, critics, business or community partners or fellow associates.



## Food for Thought



### I saw a post on social media that said something false about PFG. I could easily correct it. Should I?

No matter how tempting it may be and how good your intentions, you shouldn't respond. We need to give a consistent and approved response. Let your manager know about the post right away so PFG can address it properly.

### I am a new area manager, and I want to create social media accounts to communicate with current and potential customers. Can I do this?

While we fully support active customer engagement, associates must not create social media accounts that use their PFG email address or otherwise relate to PFG unless they have first received express permission from [Corporate Communications](#) and the applicable business division.



#### Dig In

- Regulation FD Compliance Policy
- Media Relations Policy
- Social Media Policy
- Acceptable Use Policy



# OUR RELATIONSHIPS

Putting what's right ahead of what's easy may not be the quickest route to success, but it's the route we choose at PFG. It's also how we build lasting relationships—by staying true to our culture and our Code in every action.

- [We Build Strong Partnerships](#)
- [We Do Not Engage in Bribery, Corruption or Illegal Kickbacks](#)
- [We Follow the Rules for Gifts and Entertainment](#)

# We Build Strong Partnerships

## Good relationships = better business

Relationships form the backbone of our business, so we build them and maintain them with care, making sure we all keep our promises and commit to the highest standards.

## Do What's Right

**Be the best partner.** Our business partners' actions, in addition to our own, reflect on PFG. If you work with our business partners, never engage in unfair practices such as:

- Manipulating or misrepresenting facts
- Concealing information
- Improperly sharing confidential information or intellectual property belonging to the business partner
- Doing anything that gives PFG or a business partner an unfair advantage

**Choose the best partners.** Whenever selecting our business partners, be knowledgeable and fair and base your selection on traits such as:

- Experience and reputation
- Products and services offered
- Price
- Safety and quality records
- Delivery records
- Honesty and integrity

## It's Up to You

### Choose good partners for PFG, making sure they:



- ✓ Follow our contracting policies
- ✓ Have a reputation of working with integrity
- ✓ Would represent PFG well
- ✓ Share our commitment to the highest standards
- ✓ Can enhance our business
- ✓ Use responsible sourcing practices
- ✓ Don't have past ethical violations
- ✓ Are not (and do not work with) restricted entities, individuals or countries

**Properly document the partnership.** Formalize all vendor, supplier, customer and related business relationships with outside parties in written agreements, in accordance with our Financial Authority Policy.

Never allow personal biases to affect your choice. Familiarize all partners with our Business Partner Code of Conduct and our Global Anti-Corruption Compliance Policy. Monitor their work carefully. Watch for signs of unethical or illegal activity and speak up about any concerns immediately.



### Dig In

Business Partner Code of Conduct

Financial Authority Policy

Global Anti-Corruption Compliance Policy

# We Do Not Engage in Bribery, Corruption or Illegal Kickbacks

## We win the right way

At PFG, we succeed through integrity—never through bribes or illegal payments. We don't offer or accept them.

## Do What's Right

**Work ethically and legally.** Follow PFG's policies and all applicable bribery and anti-kickback laws. Violations can result in serious penalties and criminal liability for you and the Company. If you're unsure about something, contact the [Legal Department](#).

### What are bribes and illegal kickbacks?

They are anything of value offered to improperly influence a business decision, gain an advantage or win business.

### What can they look like?

- Cash or cash equivalents (such as gift cards or gift certificates)
- More than modest meals, gifts or entertainment
- Special discounts or rebates
- Stock options
- Loans
- Charitable or political contributions
- Payment of travel expenses
- Special favors, such as employing a relative

These are only a few examples. See our policies or contact the Legal Department if you're unsure about any offer.



**Never offer or accept bribes or illegal kickbacks.** Don't use bribes or kickbacks to obtain or retain business, secure an improper advantage, or otherwise get ahead. Never offer anyone anything of value, including [gifts and entertainment](#), without first consulting the Legal Department. Further, you must not offer any gifts or entertainment to any government official (foreign or domestic) unless you have received specific prior written approval from the [Compliance Committee](#).

| When it comes to ...   | Be sure to comply with PFG's ...         |
|--|--|
| Interactions or transactions with healthcare providers or healthcare GPOs                    | Anti-Kickback Statute Compliance Policy  |
| Interactions or transactions with government officials (foreign or domestic)                 | Global Anti-Corruption Compliance Policy |
| Gifts (including meals, hospitality and entertainment) to or from any other person or entity | Gifts and Entertainment Policy           |

**Keep our records clean.** Help PFG present a clear picture of our business activities by ensuring transparency in all our [business records](#). Record all transactions fairly and accurately.

**Monitor business partners.** Everyone who works on PFG's behalf must follow the same rules we do. If you work with [business partners](#), choose them carefully and ensure they are aware of and follow PFG's policies, including our [Business Partner Code of Conduct](#).

Do you suspect a bribe or illegal kickback? [Speak up](#) immediately.

**Food for Thought**



**While reviewing an invoice from a supplier in another country, I noticed an "expediting fee" had been added. When I asked the supplier, they told me it's a standard fee to pay a customs official. Should I just submit it for payment?**

No, you shouldn't pay the invoice. Payment to speed up a routine government action is an example of a facilitation or "grease" payment, and we don't pay them at PFG. A payment like this could violate the law and our policies. You should immediately report the issue to your manager and the Legal Department before proceeding.

**One of our biggest customers is a hospital. The hospital is having a charity golf tournament and would like us to be a sponsor. Can we do this?**

Maybe. The rules relating to providing gifts to a healthcare provider are very complex and restrictive. The sponsorship could be viewed as a gift to a healthcare entity (i.e., the hospital) that may violate anti-kickback laws, so we must be very careful. Please consult with the Legal Department for guidance.



**Dig In**

- Global Anti-Corruption Compliance Policy
- [Business Partner Code of Conduct](#)
- Anti-Kickback Statute Compliance Policy
- Gifts and Entertainment Policy

# We Follow the Rules for Gifts and Entertainment

## Offers we can refuse

Giving or accepting inappropriate gifts or entertainment can damage PFG’s reputation and suggest improper influence, so we follow the rules.

## Do What’s Right

**Know and follow the rules.** Gifts, meals or entertainment can be part of a polite gesture, but if those offers are inappropriate or excessive, they may be seen as an attempt to influence decisions or gain a special advantage. The giving or receiving of any gift (including meals, hospitality and entertainment) must comply with PFG’s Gifts and Entertainment Policy.

**Be grateful without seeking gains.** Always act with integrity. What’s “customary” in one region or industry may be unacceptable in others and violate our policies. Contact the [Legal Department](#) if you have any questions.



### Never give or accept a gift under these circumstances.



You must not:

- ✗ Solicit gifts.
- ✗ Give or accept a gift:
- ✗ Understanding that someone will do or request something specific in return.
- ✗ Violating any PFG policies, policies of the giver or receiver, or the law.
- ✗ Containing money or a cash equivalent (like a gift card).

**Be extra cautious with gifts to government officials or healthcare providers.** Never offer anything of value to a healthcare provider, healthcare GPO or government official without first consulting the Legal Department and (in the case of government officials) obtaining specific prior written approval from the [Compliance Committee](#).

For gifts and other interactions or transactions with healthcare providers or healthcare GPOs, please see our Anti-Kickback Statute Compliance Policy.

For gifts and other interactions or transactions with government officials, including foreign officials, please see our Global Anti-Corruption Compliance Policy.

## It's Up to You



### To ensure integrity with gifts ...

- Use good judgment in dealings with customers, suppliers or business partners.
- Follow both our policies and the other party's policies before offering or accepting any gift.
- Get approval in advance, if required or if you are unsure.
- Check with the [Legal Department](#) and get approval from the [Compliance Committee](#) (where required) before you offer anything to a government official or to a customer who is a healthcare provider or a healthcare GPO, no matter the value.

## Food for Thought



### While I was traveling, I received a gift from a supplier that seems excessive. I don't want to insult this supplier. What should I do?

Of course, you don't want to insult the supplier, but you must ensure that the gift is appropriate under the law and our policies. Make sure the supplier is familiar with and follows PFG's Gifts and Entertainment Policy. If you aren't sure if the gift is appropriate, disclose it to your manager. Depending on the gift and its value, we may need to return it and explain our policy.



#### Dig In

##### [Business Partner Code of Conduct](#)

Global Anti-Corruption Compliance Policy

Anti-Kickback Statute Compliance Policy

Gifts and Entertainment Policy





## OUR INDUSTRY

For PFG, being a leader in our industry is all about our drive, dedication and commitment to fairness and integrity. That commitment is on full display in every action and choice we make for PFG.

- [We Compete Lawfully](#)
  - [Fair Practices](#)
  - [Competitive Research](#)
- [We Comply with Securities \(Insider\) Trading Laws](#)
- [We Follow Global Trade Laws](#)

# We Compete Lawfully

## We win fair and square

Competition drives us to innovate and be our best. At PFG, we don't break the law or our own high standards to succeed.

## Do What's Right

### Fair Practices

**Act honestly and ethically.** Follow all applicable antitrust and competition laws, and contact the [Legal Department](#) if you're unsure how a law applies to you. Never use unfair practices or make improper agreements with competitors, suppliers, customers or anyone else to give our Company an unfair advantage. Such activity may result in criminal liability, including fines and prison sentences, for you and the Company.

**Use care in conversations.** Talking to competitors and other business partners can lead to anti-competitive agreements or accusations of anti-competitive behavior. Use good judgment and shut down any discussions that might lead to agreements (including verbal agreements) or limits regarding competition. Remember, if it could look improper to someone else, it's best to avoid it.

### It's Up to You

To keep your conversations from becoming anti-competitive, do **not** discuss:



- ✗ Setting prices or components of price (including discounts and rebates), product supply or volumes or credit terms
- ✗ Agreeing to sell or not to sell certain products
- ✗ Information that's confidential or proprietary
- ✗ Manipulating the bidding process
- ✗ Splitting up or allocating territories, markets or customers
- ✗ Boycotting other competitors, suppliers or customers
- ✗ Agreeing with competitors about setting salary or benefits for employees
- ✗ Agreeing not to hire or solicit each other's employees without an underlying business purpose that has been approved by the Legal Department

If any of these topics come up, stop the conversation. Let others know that it's inappropriate, then contact the Legal Department for guidance.



**Promote PFG fairly.** We must stand behind every claim and disclosure we make at PFG. Anything we say in our marketing and promotions must be true and backed up with documentation. If your work involves marketing or advertising, follow our policies and be honest and transparent. Never make promises we can't keep, and never make false claims about the competition.

### Competitive Research

**Do your homework the right way.** Knowledge is a powerful tool for outdoing the competition. If you're researching our competitors, do so ethically and legally. Only gather publicly available information, like online resources and articles. Do not obtain competitive information from competitors. Never seek confidential information about the competition or accept anything that's been illegally obtained. Always obtain information from legitimate sources and document the source.



#### Dig In

Antitrust Quick Reference Guide



# We Comply with Securities (Insider) Trading Laws

## Good investing is fair investing

We show integrity in everything we do, including in our personal investing. You must follow securities trading laws and our Securities (Insider) Trading Policy. Securities violations are taken very seriously and can always be criminally prosecuted.

## Do What's Right

**Know when trading is prohibited.** Insider trading gives someone the ability to profit from confidential information. Know how the law and our Securities (Insider) Trading Policy applies to you.

**Protect inside information.** Through your work as a PFG associate, you may learn material information about our Company or other companies (such as PFG's customers or suppliers) that's confidential. It's your responsibility to follow the law by keeping that information confidential, never trading while in possession of such information or "tipping" it to anyone who doesn't have a legitimate business need to know. That includes friends, family members and unauthorized coworkers. If it's material, it might include information about items such as (but not limited to):

- Stock splits or dividends
- Earnings results, estimates or guidance or changes in previously released earnings results, estimates or guidance
- Mergers, acquisitions or divestitures
- Business plans, including new service offerings or significant changes in service offerings
- Investments, joint ventures or changes in assets
- The gain or loss of a significant customer
- Leadership changes
- Potential lawsuits
- Restructuring or layoffs
- Changes in auditors

If you have information that seems to be both material and nonpublic, you are prohibited from trading in PFG's securities and from tipping such information to anyone. These prohibitions also apply to other companies (such as a PFG customer or supplier) if you have material, nonpublic information about that company that you gained from your position at PFG. If you're not sure, contact the [Legal Department](#).



### It's insider trading if ...



A person buys, sells or trades securities while in possession of material information that is nonpublic.

### It's tipping if ...

Someone shares material nonpublic information with someone else who may use that information to inform their investment decisions.

### It's material if ...

A reasonable investor would consider the information important when deciding to buy, sell or hold a company's stock or other securities.

### It's nonpublic if ...

It hasn't yet been released widely (like through a press release or other public filing).

**Respect PFG's trading windows.** Certain insiders at PFG who have regular access to material nonpublic information are required to follow additional trading rules that restrict when trades can be made and what kind of transactions may be conducted. Know how these rules may apply to you before trading and contact the [Legal Department](#) with any questions.



#### Dig In

Securities (Insider) Trading Policy



# We Follow Global Trade Laws

## Integrity beyond borders

Our commitment to integrity is something we practice and take with us each day, wherever we do business. We also know that international business can get complicated, so we follow all laws that apply.

## Do What's Right

**Know what's expected. Do what's required.** To do business internationally, we need to follow a variety of laws that affect imports and exports of goods. These laws cover issues such as:

- Customs compliance
- Export controls
- International boycotts
- Trade sanctions
- Technology transfers
- Financial transactions
- Supply chain security
- Regulatory requirements (FDA, NOAA, USDA, etc.)

Know how these laws apply to your work and our transactions wherever you're conducting business. Contact the [Legal Department](#) if a requirement is unclear.

**Classify and clear imports and exports.** Obtain all necessary clearances, licenses and government approvals and perform screenings of all relevant parties involved in a transaction before importing or exporting products. Follow PFG's policies listed on the next page to ensure compliance with applicable laws and regulations.

**Stay alert for misconduct.** If you select or work with our business partners, watch their work and speak up about possible violations. Be sure they:

- Follow the law and our policies, including our [Business Partner Code of Conduct](#)
- Conduct ethical transactions and provide clear documentation
- Have no history of violations
- Don't participate in any boycotts
- Don't do business with sanctioned individuals or countries



## It's Up to You



### International transactions must ...

- Be accurate and complete
- Have proper classification and clearances
- Show proper declared value
- Show who is involved at each step of the transaction
- Show final destination and use

### They must NOT ...

- Involve sanctioned individuals, entities or countries
- Have accounting irregularities
- Include payment of facilitation fees

## Food for Thought



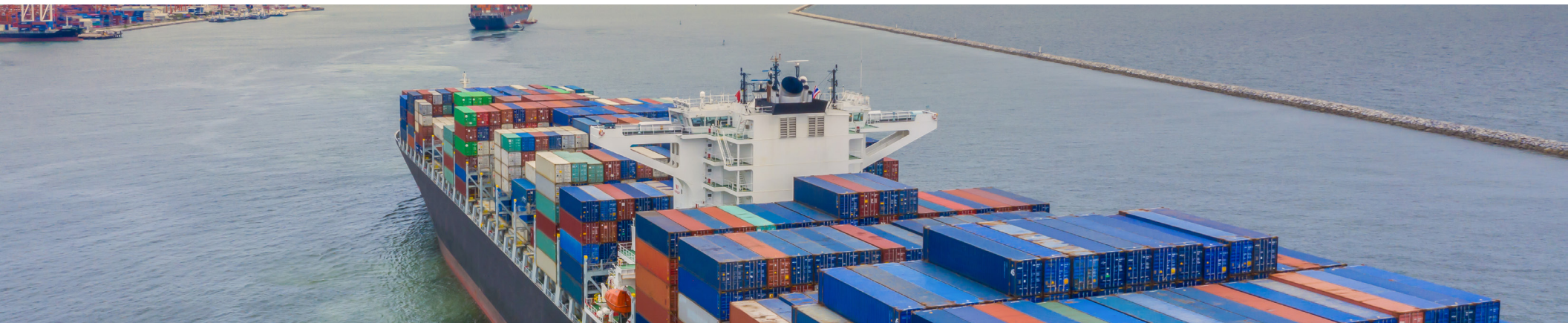
**I received an invoice from a business partner for an international transaction. It includes some irregularities like multiple parties and multiple bank accounts. Should I be concerned?**

Yes, this invoice may contain signs of money laundering, a process that moves illegally earned funds through a legitimate company. We keep this activity out of PFG. Contact the Legal Department before processing this invoice to make sure it's legitimate.



### Dig In

- Trade Compliance Policy
- Export Compliance Checklist
- Records and Information Management Policy
- Business Partner Code of Conduct
- Enterprise Human Rights Policy
- Global Anti-Corruption Compliance Policy





# OUR COMMUNITIES

To our core, PFG is a company that cares. From our sustainable products and processes to our commitment to communities and stewardship, we continually strive to address the challenges affecting our world.

- [We Protect Human Rights](#)
- [We Preserve Our Environment](#)
- [We Support Our Communities](#)
- [We Participate Responsibly in Political Activities](#)

# We Protect Human Rights

## People come first

Our work is all about helping others. That means we protect the human rights and dignity of those in our workplace and communities, both local and global.

## Do What's Right

**Support human rights for all.** We prohibit the use of all forms of forced labor, human trafficking and physical punishment or abuse.

We also protect the rights of children, complying with child labor laws and not hiring anyone under the age of 18.

**Help ensure fair pay.** Everyone who works for PFG deserves fair and lawful pay for time worked. Never encourage anyone to work “off the clock” and make sure hours are reported accurately and required breaks are taken.

**Choose responsible partners.** We do not work with anyone who violates employment laws or engages in human rights abuses. Whether you’re searching for a new hire or a new [business partner](#), select those who agree to uphold our standards, monitor them closely and take corrective action when needed.

## Food for Thought



**I am a non-exempt (hourly) associate, and I believe I may have neglected to report all time worked from last week. What should I do?**

You may raise any timekeeping questions with your manager, but you should report all time worked. Never work “off the clock” and always take the meal and rest breaks you’re provided. Recording your time accurately helps ensure fair compensation.



### Dig In

[Enterprise Human Rights Policy](#)

[Business Partner Code of Conduct](#)



# We Preserve Our Environment

## Building a better tomorrow

Providing sustainably sourced products and positively impacting the environment through energy management are crucial to this mission. Ultimately, we know that when we protect our planet, we protect the future of our people.

## Do What's Right

**Comply with the law.** Meet or exceed all environmental laws and regulations when going about your daily work and encourage others to do the same. Also, take all required trainings on environmental policies and, if any policy or procedure remains unclear, reach out to your manager for help.

**Commit to our goals.** Building a better future takes more than wishful thinking—it takes a plan of action. We're committed to our goals for energy efficiency, emissions reduction, waste management, use of renewable energy and engaging with partners who practice responsible sourcing. Align your work with our goals to help uphold organizational standards.

**Work responsibly.** Whether it's recycling whenever possible, reducing non-essential business travel or turning off electronics and lights when not in use, your individual efforts will go a long way.



### What are PFG's environmental goals?



Some of them include:

- Reducing power consumption
- Purchasing electricity from renewable sources
- Establishing a company-wide carbon reduction target
- Expanding sustainable offerings for customers
- Conducting ESG supplier surveys

For the full list of our goals and additional details, check out our [Corporate Social Responsibility Report](#).



### Dig In

[Environmental Policy](#)

[Climate Change Policy](#)

# We Support Our Communities

## Caring close to home

Community engagement is important to us, not only as a family of companies, but also as individuals. We understand that better neighborhoods—across town, throughout the country and around the world—start with a commitment to step up and help.

## Do What's Right

**Join us!** PFG provides support to corporate organizations as well as to local partners in the communities where our associates and their families live. You are encouraged—but not required—to be a part of these initiatives in any way that feels right to you. Participate in our annual food drive, join your coworkers in local non-profit activities or donate to our disaster response fund. Find out more about these and other opportunities to serve by contacting [Corporate Communications](#).

**Make your own mark!** We encourage you to get involved in the causes—both charitable and professional—that mean the most to you. Just make sure that your outside activities don't interfere with your job or create a [conflict of interest](#). And don't use PFG's money, resources, time or name unless the activity is for a bona fide charitable cause and is Company-sponsored or has otherwise been approved in advance either by the [Compliance Committee](#) or through the approval process in our Financial Authority Policy.

### Be inspired!

You can read more about our community engagement and collaboration partnerships in our [Corporate Social Responsibility Report](#).



### Food for Thought

**My OpCo recently submitted a contract bid to service a potential customer. Several other food distributors also submitted bids. In a meeting with that potential customer, they said that a contribution to their foundation might make them inclined to award the contract to PFG. How should I respond to that?**



You should immediately contact the [Legal Department](#) to report the incident. A charitable contribution that's solicited in exchange for a contract may signal a bribe, instead of a well-intentioned gesture. Be careful. We should never make any kind of charitable contribution if the intent is to influence a business decision.



### Dig In

Global Anti-Corruption Compliance Policy

# We Participate Responsibly in Political Activities

## Our politics are personal

PFG may sometimes participate in the political process for issues that affect our industry and communities. When we do, we always comply with federal, state, provincial and local laws. We also know our associates have their own personal political interests and activities. We must all follow the law carefully and never mix PFG’s political activities with our own.

## Do What’s Right

**Be responsible, be respectful.** PFG respects efforts to promote the common good—you’re free to pursue any activities or affiliations you’re passionate about. Just make it clear your personal political views and actions don’t represent PFG, and don’t use Company resources, time, money or property (or even wear Company logos) to support your involvement.

**Don’t contribute on our behalf.** Don’t make any contribution, directly or indirectly, to any cause, candidate, official, political action committee (“PAC”) or political party (foreign or domestic) on PFG’s behalf at any level of the Company—Corporate, Division, Business Line, Segment or OpCo. Those contributions are illegal. We will not reimburse any contributions you make. Please contact the [Legal Department](#) before making any payment that might be viewed as a contribution on behalf of PFG.

**Please don’t lobby on our behalf, either.** Contact the Legal Department before communicating with government officials, staff, candidates or political parties about any legislation or administrative action that affects PFG. All Company-sponsored political activities and lobbying efforts must be approved in advance by the Company’s [Compliance Committee](#). And if you interact with government officials, make sure your conduct doesn’t even suggest political lobbying.

**Don’t give gifts or gratuities without the required approval.** You must consult with the Legal Department and obtain specific prior written approval from the Compliance Committee before providing any gift, meal, gratuity or entertainment to a government official, and any such gift must comply with our Global Anti-Corruption Compliance Policy.



**What is a “contribution”?**



- A monetary or non-monetary payment to a candidate, official, political party or PAC, including but not limited to buying campaign merchandise or a ticket to a fundraising event
- Non-monetary (or in-kind) contributions, which are goods or services provided for free or discounted, including but not limited to meals or rent, or the use of meeting space, vehicles, computers, telephones, advertising or other resources

**What is “lobbying”?**

- Contact (phone, email, meeting, etc.) with public officials or staff in an effort to influence legislative or administrative action
- Providing gifts or entertainment to such officials (as well as a separate violation, e.g., bribery)
- Lobbying may require registration with and/or reporting to authorities and may be subject to other restrictions

**Food for Thought**



**I am hosting a fundraiser for my neighbor, who is running for local office. Any problem with this?**

Probably not. It is perfectly OK for you to participate in the political process and make direct or indirect (in-kind) contributions on your own personal behalf to any candidate—as long as you do not use any PFG funds, property or resources. And remember to keep your personal activities separate from your work activities, and don’t associate the PFG name in any way with your support for a candidate, official, political party or PAC.



**Dig In**

Global Anti-Corruption Compliance Policy



# Our Future

We appreciate you taking the time to read PFG's Code of Conduct.

The Code is intended to help guide you in upholding the law, making sound and prudent business decisions, and bringing our culture to life. It is not, and is not intended to be, an exhaustive list of approved or non-approved conduct.

Our hope is that you keep the Code in mind as you work, and let it guide your daily decisions. When each of us takes our Code to heart and follows it each day, we show the world what it means to put Integrity in Action.

For PFG, it means ...

- Recognizing your responsibilities
- Making good decisions
- Holding yourself (and others) accountable
- Lending a hand
- Raising your voice

It can mean even more—it all depends on you. You have the power to make your mark at PFG, helping us build an amazing workplace while you build a lasting career. Together, we'll keep our customers thriving and our Company growing—always ready for what comes next.



# Our Resources

Do you have questions? We're ready to help:

| ISSUES OR CONCERNS   | CONTACT   |
|--|---|
| <p>Questions or reports of potential misconduct, conflicts of interest or other ethical concerns</p> | <ul style="list-style-type: none"> <li>• Your manager</li> <li>• Your Human Resources representative</li> <li>• The Legal Department</li> <li>• Any member of management</li> </ul> <p>Or, if you prefer, you may contact:</p> <ul style="list-style-type: none"> <li>— The EthicsPoint Hotline</li> <li>— Call 1-800-800-1827</li> <li>— Visit <a href="http://pfgc.com/speakup">pfgc.com/speakup</a></li> <li>— Email <a href="mailto:ethics.matter@pfgc.com">ethics.matter@pfgc.com</a></li> </ul> <p>To report theft or fraud, contact the EthicsPoint Hotline or email Internal Audit at <a href="mailto:internal.audit@pfgc.com">internal.audit@pfgc.com</a>.</p> |
| <p>Accounting, internal accounting controls or auditing matters</p>                                  | <p>The Audit and Finance Committee of the Board of Directors<br/>         Performance Food Group Company<br/>         12500 West Creek Parkway<br/>         Richmond, VA 23238<br/>         Attn: Chairman</p>  |
| <p>Matters requiring Compliance Committee approval</p>   | <p>Compliance Committee<br/>         (consisting of the Chief Financial Officer, Chief Human Resources Officer and General Counsel)</p>   |
| <p>Legal or compliance questions</p>   | <p>Legal Department</p>   |
| <p>Information on Company benefits</p>   | <p>Human Resources</p>  |
| <p>Requests from analysts or investors</p>   | <p><a href="#">Investor Relations</a></p>   |
| <p>Requests from the media or questions about community engagement efforts</p>                       | <p><a href="#">Corporate Communications</a></p>   |
| <p>Concerns relating to information security, including data breaches</p>                            | <p><a href="#">Information Security</a></p>   |

PFG reserves the right to modify this Code at any time, as necessary, along with our policies, procedures and conditions of employment. The Code is not intended as a contract or guarantee of employment.

No waiver of this Code may be made for a member of our Board of Directors or an executive officer without the written waiver of our Board of Directors or the Audit and Finance Committee. Any such waivers will be disclosed to the Company’s stockholders in accordance with applicable rules and regulations. Waivers for any other associate may only be made by the Compliance Committee.

We support our associates’ rights to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment, including discussions about wages, hours, work conditions, health hazards, safety issues and other activities protected under Section 7 of the U.S. National Labor Relations Act.

Nothing in any section of our Code or any of our policies precludes an associate from filing a charge or complaint with, or voluntarily participating in an investigation or proceeding conducted by National Labor Relations Board, the EEOC (or other similar state or local agency), the U.S. Department of Labor, the Securities and Exchange Commission, the Occupational Safety and Health Administration or any other federal, state or local agency charged with the enforcement of any laws including providing documents or other information, or from testifying truthfully in the course of any administrative, legal or arbitration proceeding, provided that the information subject to such disclosure was not obtained by the associate through a communication that was subject to the attorney-client privilege. The Company does not authorize the waiver of the attorney-client privilege or work product protection or any other privilege or protection belonging to the Company.

