MODERN SLAVERY ACT TRANSPARENCY STATEMENT

As a leader in foodservice distribution, Sysco recognizes and takes seriously its responsibility to follow industry best practices and distribute food products from suppliers that meet high standards of safety, quality, traceability and social and environmental stewardship. Sysco expects its suppliers to uphold the rights of individuals as outlined in the United Nation Declaration of Human Rights (UNDHR), the Core Conventions of the International Labour Organization (ILO) and the ILO Declaration on Fundamental Principles and Rights at Work. Any act of human trafficking, slavery or child labor within Sysco’s supply chain is unacceptable and is specifically prohibited by the Code (as defined below).

Sysco maintains a strict Supplier Code of Conduct (the “Code”) containing the legal, moral and ethical standards it expects of suppliers, including the protection of human rights. Sysco requires each of its suppliers and their facilities to operate in full compliance with the Code and with all applicable national, state, provincial, regional, local and other laws and regulations. The Code also applies to affiliates and subcontractors of suppliers and to their respective facilities to the extent those facilities supply goods for ultimate sale to Sysco. Specifically, the Code states that Sysco will only initiate and renew contractual relationships with suppliers that do not violate basic human rights. Sysco is currently working to benchmark the Code against its peers as well as best practices to identify opportunities to strengthen the requirements placed on its suppliers.

In addition, all Sysco Brand approved seafood suppliers in high-risk Latin American and Asian countries must undergo third party assessments to identify potential risks relating to wages, working hours, discrimination, worker safety, living conditions, and child and forced labor. Global independent safety science leader UL’s Responsible Sourcing Group has conducted these annual audits on Sysco’s behalf since 2008. Based on the results of these audits, Sysco works with its Sysco Brand suppliers and processors that do not achieve perfect scores to develop improvement plans and then conduct follow-up assessments to ensure that plans have been implemented. In the event that a supplier or processor is unable or unwilling to introduce improvements, or if a supplier or processor has committed a critical violation of its standards, Sysco terminates the relationship. Sysco is currently exploring enhancements to this longstanding supplier audit program, including consideration of an updated, more dynamic risk assessment tool.

As a result of specific concerns about labor violations in the seafood supply chain that have recently been chronicled in the media, Sysco has increased its efforts on several fronts, both independently as well as in cooperation with other companies, associations and NGOs.

As a member of the National Fisheries Institute (NFI), which has conducted a comprehensive analysis of the leading global social responsibility standards to help participating companies find the most thorough and credible labor systems, Sysco is committed to conducting business with entities that follow international laws to ensure an appropriate, safe, ethical and sustainable food supply chain. Through its membership in NFI, Sysco actively participates with other stakeholders to support
actions needed to end human rights violations, including a call for governments in Southeast Asia and throughout the world to be more vigilant in enforcing fair, moral and ethical labor practices.

Sysco has also recently joined the Shrimp Sustainable Supply Chain Task Force, a membership organization that includes retail, foodservice and NGO participation. The task force aims to strengthen worker well-being and compliance with laws governing the seafood supply chain through implementation of a track and trace system of international verification from vessel to feed mill; development of a standard code of conduct model for ports, brokers and vessels; and support for fishery improvement projects to mitigate the effects of overfishing, which can contribute to human rights abuses in the shrimp supply chain.

Earlier this year, Sysco reinforced its commitment to improving the sustainability of seafood procurement practices and standards by extending its longstanding alliance with World Wildlife Fund (WWF) through 2020. Among other things, Sysco is working with WWF to enhance seafood traceability within its supply chain and globally by participating in the Global Dialogue for Seafood Traceability.

Sysco has also undertaken a number of additional actions specific to suppliers and processors in Southeast Asia. Sysco suspended all purchases of unprocessed, farm-raised shrimp from Thailand under the Sysco Portico Brand since October 2014. Sysco has also maintained regular communication with all of its seafood suppliers regarding these issues, including dialogue with suppliers in Thailand about actions they are taking to eradicate human rights issues in the supply chain. Sysco continues to monitor actions by processors in Thailand on an ongoing basis to evaluate their progress and proactively look for proof that they remain active participants in efforts to protect human rights. Sysco believes ongoing engagement and monitoring of suppliers is necessary to drive continuous improvement. By continuing to participate in the international seafood market, Sysco believes it can contribute to the type of successful reforms that have taken place in land-based industries with simpler supply chains like textiles, technology and other food products.

Beyond the numerous steps taken to date, Sysco will continue to consider further actions to evaluate and strengthen current practices as well as opportunities to collaborate with other stakeholders to ensure that its seafood supply chain is free from any human rights concerns. Sysco is committed to playing a constructive role in addressing this serious issue and will engage with interested stakeholders to develop and implement meaningful, practical and effective solutions.

This statement has been published in accordance with section 54 of the UK Modern Slavery Act 2015. This statement applies to the fiscal year ending July 2, 2016.

This statement has been approved by the Corporate Sustainability Committee of the Board of Directors of Sysco Corporation.

Signed: /s/ Judith B. Craven, M.D.

Judith B. Craven, M.D.

Chair of the Corporate Sustainability Committee