

	Subject: North American Supplier Code of Conduct	Effective Date: May 1, 2025
	Owner: Director, NA Strategic Procurement	Supersedes Policy Dated: September 1, 2018
	Type: Complete Revision () Partial Revision (x) New ()	Approved By: Director, NA Strategic Procurement

North American Supplier Code of Conduct

At Gordon Food Service we conduct business with the highest level of integrity and ethics, and in accordance with all applicable laws and regulations. These principles have guided our thought process, decisions, and approach for more than 120 years. All Gordon Food Service employees are required to affirm their commitment to these principles as described by acknowledging our Employee Code of Business Conduct. We view our suppliers as partners in fulfilling our commitment to these principles and require they comply with this Supplier Code of Conduct.

For purposes of this Supplier Code of Conduct (the “**Code**”), a supplier means any direct or indirect vendor, broker, consultant, or other service provider to Gordon Food Service and its subsidiaries, affiliates, and divisions (together, “**Gordon Food Service**”). This Code sets forth the principles and ethical standards that we expect all our suppliers to work toward achieving throughout the course of our business relationship. Suppliers who knowingly violate laws or have repeated problems conforming to these principles may not receive our business.

Legal Compliance

We expect each supplier to conduct its business in full compliance with our mutual customer’s requirements, industry best practices, any and all applicable federal, state, provincial, and local laws; and any regulations in the locations in which they operate and where their products are ultimately sold.

Labor and Human Rights

We are committed to observing fair labor practices and to treating everyone with dignity and respect. Gordon Food Service relies upon human rights definitions as set forth by the [United Nations Declaration of Human Rights](#) (UNDHR). We expect our suppliers to make the same commitments by having controls in place that:

- Ensure a workplace free from discrimination or harassment
- Prohibit any form of child labor, forced labor, or human trafficking
- Verify the employment eligibility of their employees
- Ensure compliance with applicable wage, hour, and benefits laws
- Respect the right of employees to freely associate

Health and Safety

We are committed to conducting business in a way that provides a safe and healthy work environment for our employees. We expect our suppliers to operate in a manner that:

- Complies with all applicable health and safety laws, regulations, and standards.
- Takes necessary steps to protect workers from workplace accidents, illnesses, and injuries.

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Product Safety and Quality

We are dedicated to providing our customers with quality food products. We expect our suppliers to comply with government food safety requirements, industry best practices and product specifications at all times. Suppliers are expected to have policies and procedures in place to manage the safety and quality of the products they provide, from development to delivery. Suppliers must immediately report any issues with product safety or quality so that appropriate actions may be taken.

Animal Well-Being

We believe in the humane treatment of animals. We require that our suppliers comply with applicable laws and regulations of the countries, states, and localities in which they operate. We expect our suppliers to use humane procedures and sound animal husbandry practices to prevent the mistreatment of animals. We also expect our suppliers to adhere to published industry standards and regulatory requirements within their respective processing or manufacturing areas. We invite our suppliers to review our [Animal Well-Being Statement](#) for further guidance.

Environment and Sustainability

As good stewards, we strive to conduct business in a responsible and sustainable manner. We want to conduct business with suppliers who share our commitment to stewardship and who establish environmental policies and practices to manage, monitor, and reduce the impact of their operations on the environment. We invite our suppliers to review our stewardship initiatives for [Gordon Food Service U.S.](#) and [Gordon Food Service Canada](#) to learn more.

Confidentiality and Privacy

Suppliers with access to confidential information from or about Gordon Food Service should not disclose such information to any other person without prior written consent. Confidential information includes, but is not limited to:

- Private brand product specifications and recipe formulations
- Supply agreements including cost, pricing and marketing allowances
- Customer identification and information
- Employee identification and information
- Any other information about Gordon Food Service not otherwise known in the public domain

When suppliers handle Gordon Food Service information they shall safeguard it by keeping it secure, limiting access, and avoiding discussing or revealing such information in public places. Suppliers shall ensure data and information security procedures are in place to protect its information technology environment. For confidential employee or customer information, such as home addresses, Social Security numbers, birth dates, driver's license, or medical information, procedures must be in place to ensure that the confidential information is protected against unauthorized disclosure and

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theft. If a supplier becomes aware of an actual or possible unauthorized disclosure of Gordon Food Service company or employee information, or a security breach, it must be reported immediately to Gordon Food Service's Enterprise Information Security Department at informationsecurityhelp@gfs.com. This requirement extends even after the conclusion of a supplier's business relationship with Gordon Food Service.

Business Ethics

We are committed to operating our business with integrity, respect, accountability, and honor. [Our Cornerstone Values](#) are the principles we believe in that guide our actions and interactions each day. We expect our suppliers to conduct business in accordance with the highest ethical standards and to have controls in place that prohibit and detect the misuse of company assets, corruption, bribery, fraud, extortion, and embezzlement. Gifts or hospitality exchanged in the normal course of business must be reasonable and customary and not be intended to influence business decisions or provide an unfair advantage. All suppliers' business dealings should be fair, legal, and honest.

Reporting Concerns

Suppliers may report suspected violations of this Code to a Gordon Food Service manager or the Gordon Food Service Integrity Hotline 24/7 at (800) 727-4811 or www.reportlineweb.com/GFSIntegrityHotline. All reports will remain confidential to the extent permitted by law.

Verification of Supplier Compliance

Gordon Food Service seeks to conduct its business in accordance with the principles defined in this Code, and engage suppliers who proactively seek to do the same. We reserve the right to request information, audit a supplier's facilities, or have an independent third party audit a supplier's facilities, with the expectation that suppliers will correct any identified deficiencies.

Suppliers should inform Gordon Food Service of any deviation from this Code, including significant regulatory noncompliance or news event that may jeopardize views of our company or our legal compliance.

Thank you for being a valued supplier to Gordon Food Service and for your commitment to upholding these standards.