

**Company Name** Sysco  
**Industry** Agricultural Products (Supply Chain only)  
**UNGP Core Score (\*)** 6.0 out of 26

| Score   | Out of    | For indicators   |
|---|-----------|--|
| <b>Governance and Policy Commitments</b>                |           |  |
| 1   | 2         | A.1.1 Commitment to respect human rights   |
| 0.5   | 2         | A.1.2 Commitment to respect the human rights of workers  |
| 0   | 2         | A.1.4 Commitment to engage with stakeholders   |
| 0   | 2         | A.1.5 Commitment to remedy   |
| <b>Embedding respect and Human Rights Due Diligence</b> |           |  |
| Embedding respect                                       |           |  |
| 0   | 2         | B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions                                       |
| Human Rights Due Diligence (HRDD)                       |           |  |
| 0   | 2         | B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts                            |
| 0   | 2         | B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)                  |
| 1   | 2         | B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action              |
| 0   | 2         | B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts |
| 0   | 2         | B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed  |
| <b>Remedies and Grievance Mechanisms</b>                |           |  |
| 1.5   | 2         | C.1 Grievance channels/mechanisms to receive complaints or concerns from workers   |
| 2   | 2         | C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities              |
| 0   | 2         | C.7 Remedying adverse impacts and incorporating lessons learned  |
| <b>6.0</b>  | <b>26</b> |  |

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

| Indicator Code | Indicator name                                    | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| A.1.1          | Commitment to respect human rights                | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: The company indicates that 'The respect and protection of fundamental human rights is critically important to us. We operate globally in a manner that supports the basic human rights. [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs</li> <li>• Not met: OECD: The company indicates in the Suppliers Code of Conduct that additionally to the commitments they must make, other resources to follow are the OECD Guidelines for Multinational Enterprises, the UN Universal Declaration of Human Rights, the International Labour Organization Conventions and Recommendations and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. However no evidence has been found that Sysco commits to these initiatives. [Sysco corporation supplier code of conduct: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul>   |
| A.1.2          | Commitment to respect the human rights of workers | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: ILO Core: The company indicates that 'We operate globally in a manner that supports the basic human rights, including the rights of associates to have fair wages and benefits in accordance with local laws, a safe and healthy working environment, a right to freedom of association, a workplace free of harassment and discrimination and one that prohibits child labor, forced labor and human trafficking. However no evidence has been found of a commitment to respect the right to collective bargaining. [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>• Not met: UNGC principles 3-6</li> <li>• Met: Explicitly list All four ILO for AG suppliers: The Supplier code explicitly covers child labour, forced labour, discrimination, freedom of association and collective bargaining. In relation to these last two, it states the 'you will give your employees the right to freely associate and organize and to legally bargain collectively'. [Sysco corporation supplier code of conduct: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: No evidence found of a commitment to respect the right to collective bargaining. [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The company indicates that 'It is extremely important to us to safeguard the health and safety of our work environment and the communities in which we operate. Each of us is responsible for acting in a way that protects ourselves and others'. [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: The company indicates that 'Sysco requires that all facilities that are used to produce goods for Sysco have a safe and healthy work environment for all the employees. When housing is provided, it should also be clean and safe'. [Sysco corporation supplier code of conduct: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> |
| A.1.4          | Commitment to engage with stakeholders            | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement: The Proxy Statement indicates that 'Communicating with stakeholders, whether customers, suppliers, employees or stockholders, has always been an important part of how Sysco does business.' Moreover, in the Corporate Social Responsibility Report 2019, the company indicates that the Corporate Social Responsibility Committee 'reviews, evaluates, and assesses Sysco's Corporate Social Responsibility (CSR) Strategy implementation. The Committee's responsibilities are as follows: Reviews and acts</li> </ul>   |

| Indicator Code | Indicator name       | Score (out of 2) | Explanation   |
|----------------|----------------------|------------------|---|
|                |                      |                  | <p>in an advisory capacity to the Board and management with respect to policies and strategies that affect Sysco's role as a socially responsible organization; Reviews, evaluates, and provides input on the development and implementation of Sysco's CSR Strategy, which focuses on three pillars: People, Products, and Planet and on the implementation of any CSR goals previously established by the Board'. However no formal evidence found of the Company committing it to engage with its potentially and actually affected stakeholders. [CSR 2019, 11/2019: <a href="http://sysco.com">sysco.com</a> &amp; Proxy statement 2019, 10/2019: <a href="http://investors.sysco.com">investors.sysco.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Regular stakeholder engagement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul> |
| A.1.5          | Commitment to remedy | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts</li> </ul>   |

### Embedding Respect and Human Rights Due Diligence

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| B.1.1          | Responsibility and resources for day-to-day human rights functions                               | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions</li> <li>• Not met: Senior responsibility for HR: The Company reports in its CSR 2019 that its 'Corporate Social Responsibility Committee consists of at least three Board members and reviews, evaluates, and assesses Sysco's Corporate Social Responsibility (CSR) Strategy implementation.' However, this is a board level committee. In addition, there are some references about a CSR team. However, no further information found about this team or another with senior level with human rights responsibilities within the Company. [CSR 2019, 11/2019: <a href="http://sysco.com">sysco.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for AG in supply chain</li> </ul> </li></ul> |
| B.2.1          | Identifying: Processes and triggers for identifying human rights risks and impacts               | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: Identifying risks in AG suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>  |
| B.2.2          | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)     | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): The Company indicates that 'All Sysco Brand approved 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'. However, no further information found describing the process it takes to assess what it considers to be its salient human rights issues. [CSR 2019, 11/2019: <a href="http://sysco.com">sysco.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 1 met</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>                                     |
| B.2.3          | Integrating and Acting: Integrating assessment findings internally and taking appropriate action | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in AG supply chain</li> <li>• Met: Example of Actions decided: The Company provides an example of an action decided regarding labour rights issues in their seafood supply chain. The Company discloses "</li> </ul>  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>"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.</p> <p>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.</p> <p>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.</p> <p>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." [Modern Slavery Act Transparency Statement, 2018: <a href="https://www.sysco.com">sysco.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul> |
| B.2.4          | Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>  |
| B.2.5          | Communicating : Accounting for how human rights impacts are addressed   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AG suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>  |

## Remedies and Grievance Mechanisms

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| C.1            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The company indicates that 'you have many resources available to help you. You can speak with your immediate manager, next-level manager, Human Resources, the Legal Department or the Ethics and Compliance Office (ECO). You also have an additional resource, The Ethics Line, Sysco's global, multi-lingual hotline that you can contact via phone or web. It is available to all – associates, vendors, consultants, temporary associates, contractors, subcontractors or suppliers – to voice concerns'. The Global Code of Conduct containing these instructions includes human rights commitment. [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Met: Channel is available in all appropriate languages: The company indicates about the Ethics Line that it is operated 'worldwide, with country-based toll free numbers and interpreters when needed'. You can also voice a concern through the online tool, which is available in more than 40 languages. [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>• Met: Opens own system to AG supplier workers: The company indicates that 'The Ethics Line, Sysco's global, multi-lingual hotline that you can contact via phone or web. It is available to all – associates, vendors, consultants, temporary associates, contractors, subcontractors or suppliers – to voice concerns'. [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul>   |
| C.2            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 2                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company indicates that 'The Ethics Line, Sysco's global, multi-lingual hotline that you can contact via phone or web. It is available to all – associates, vendors, consultants, temporary associates, contractors, subcontractors or suppliers – to voice concerns'. The Company has clarified to the CHRB that the Ethics Line is available to anyone to report a concern at <a href="https://ethicsline.sysco.com">ethicsline.sysco.com</a>. [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The Company indicates that 'The Ethics Line, is available 24 hours a day, seven days a week, 365 days a year, worldwide, with country-based toll free numbers and interpreters when needed'. In addition to there is an online tool available in more than 40 languages. The Company has also clarified that it is a 'multi-lingual hotline'. [Sysco Global code of conduct, June 12, 2017: <a href="https://www.sysco.com">sysco.com</a> &amp; Ethics line website, N/A: <a href="https://ethicsline.sysco.com">ethicsline.sysco.com</a>]</li> <li>• Not met: Expects AG supplier to have community grievance systems</li> <li>• Met: AG supplier communities use global system: The Company indicates that 'a confidential helpline, Ethics Line, through which anyone, internal or external to Sysco, can report suspected or actual misconduct without fear of retaliation'. [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>]</li> </ul> |
| C.7            | Remedying adverse impacts and incorporating lessons learned   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided: The Company indicates that it is 'committed to playing a meaningful role in addressing this serious issue and will engage with interested stakeholders to develop and implement actionable, practical, and effective solutions.' However no description has been found of the approach taken to provide remedy for victims. [CSR 2019, 11/2019: <a href="https://www.sysco.com">sysco.com</a>]</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>  |

## Performance: Responses to Serious Allegations (Not included in the overall score)

| Indicator Code | Indicator name          | Score (out of 2) | Explanation  |
|----------------|-------------------------|------------------|--|
| E(1).0         | Serious allegation No 1 |                  | No allegations meeting the CHRB severity threshold were found. |

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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