

Company Name Sysco
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 18.6 out of 100

Theme Score	Out of	For Theme
1.8	10	A. Governance and Policies
5.3	25	B. Embedding Respect and Human Rights Due Diligence
4.2	15	C. Remedies and Grievance Mechanisms
0.5	20	D. Performance: Company Human Rights Practices
3.7	20	E. Performance: Responses to Serious Allegations
3.1	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2019 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> 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: sysco.com] Score 2 <ul style="list-style-type: none"> Not met: UNGPs 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: sysco.com]
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>right to collective bargaining. [Sysco Global code of conduct, June 12, 2017: sysco.com]</p> <ul style="list-style-type: none"> • Not met: UNGC principles 3-6 • 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: sysco.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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: sysco.com] • Met: Respect H&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: sysco.com] • Met: H&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: sysco.com]
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	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"> • Not met: Respect land ownership and natural resources • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC Performance Standards • Not met: FPIC for all • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people’s rights (AG)	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"> • Not met: Women's rights • Not met: Children's rights • Not met: Migrant worker's rights • Met: Expects suppliers to respect these rights: The company indicates in the supplier code of conduct that "If foreign or migrant workers are working for you, you must follow the labor and immigration laws of the host country. Before hiring, the basic terms of the employment must be provided to the workers in a language they understand. Workers will be able to keep their own passports and other forms of personal identification, which are never to be withheld by you or any third party." However no evidence has been found of Women or Children’s Rights commitment. [Sysco corporation supplier code of conduct: sysco.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
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"> • 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 CR Report 2018, the company indicates that "the Corporate Social Responsibility Committee reviews and assesses Sysco’s corporate responsibility and sustainability activities against the company’s policies and its commitment to operate as a socially responsible business. The Committee ensures that stakeholder concerns about environmental, social, and governance issues are considered with identified priorities". However no formal evidence found of the Company committing it to engage with its potentially and actually affected stakeholders. [Modern slavery act transparency statement, 2015: MODERN SLAVERY ACT TRANSPARENCY STATEMENT & Proxy Statement 2018, 2018: investors.sysco.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder engagement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Regular stakeholder design engagement
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"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	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"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Global Supplier Code of Conduct states " <p>"We strive to create an environment where associates feel comfortable to raise concerns and are confident that those concerns will be addressed. Sysco prohibits retaliation against anyone who reports a concern in good faith or who participates in an internal or external investigation. This means that an associate who has raised a concern that is honest, sincere and complete to the best of their knowledge, cannot and must not be the target for any type of retaliation. Retaliation could include, but is not limited to, termination, job demotion, intimidation, humiliation, exclusion and threats. Retaliation will not be tolerated." However, this does not cover human rights defenders more broadly, or extend beyond complainants. [Sysco Global code of conduct, June 12, 2017: sysco.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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"> • Met: CEO or Board approves policy: The company's Code of Conduct has been signed by the CEO. [Sysco Global code of conduct, June 12, 2017: sysco.com] • Met: Board level responsibility for HRs: The company indicates that 'The Corporate Sustainability Committee reviews and assesses Sysco's corporate responsibility and sustainability activities against the company's policies and its commitment to operate as a socially responsible business. The Committee ensures that stakeholder concerns about environmental, social and governance issues are considered with identified priorities'. [Ethics and Governance - Governance: sustainability.sysco.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	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"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	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"> • Not met: Incentives for at least one board member: The company indicates that "The Compensation Committee establishes the policies and criteria informing executive compensation, with an interest in attracting, developing and retaining business leaders to drive financial and strategic growth and build long-term stockholder value. The Committee's activities include assessing executive compensation against company performance and individual objectives; establishing competitive structures to attract, retain and develop executive talent; and managing risk through appropriate compensation policies." <p>However no evidence has been found of incentives or performance management schemes linked to and aspect of the company HR policies. [Ethics and Governance - Governance: sustainability.sysco.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: At least one key AG HR risk, beyond employee H&S • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

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"> • Not met: Commits to ILO core conventions • Not met: Senior responsibility for HR: The company indicates that "An important step occurred in 2008, when the Board of Directors established the Corporate Social Responsibility Committee to ensure that senior leadership is engaged in CSR issues". However, this is a board level committee. No evidence found of senior level responsible within the Company. [Sustainability Report 2018, 26/11/2018: investors.sysco.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for AG in supply chain
B.1.2	Incentives and performance management	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"> • Not met: Senior manager incentives for human rights: The company indicates that "The Compensation Committee establishes the policies and criteria informing executive compensation, with an interest in attracting, developing and retaining business leaders to drive financial and strategic growth and build long-term stockholder value. The Committee's activities include assessing executive compensation against company performance and individual objectives; establishing competitive structures to attract, retain and develop executive talent; and managing risk through appropriate compensation policies." <p>However no evidence has been found of incentives or performance management schemes linked to and aspect of the company HR policies for senior managers. [Ethics and Governance - Governance: sustainability.sysco.com]</p> <ul style="list-style-type: none"> • Not met: At least one key AG HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	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"> • Not met: HR risks is integrated as part of enterprise risk system <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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"> • Not met: Commits to ILO core conventions • Not met: Communicates its policy to all workers in own operations: The company indicates that it 'has established a Global Supplier Code of Conduct (Supplier COC), which describes the legal, moral, and ethical standards we expect from suppliers, including the protection of human rights. In Fiscal Year 2018, the Code was updated to include enhanced sections pertaining to anticorruption, foreign or migrant workers, and conflicts of interest. It also expands Sysco's monitoring rights with third parties beyond Sysco Brand products and provides clear reporting requirements for any violation or potential violations. The updated Code is being communicated via multiple channels and applies to all suppliers throughout our global operations. Additionally, our Fiscal Year 2019 annual Global Code of Conduct training includes associate training on human rights'. It is translated to French, Spanish, Cantonese and Mandarin. However, no evidence found on how its policy commitments have been actually communicated to all workers. [Sustainability Report 2018, 26/11/2018: investors.sysco.com & Code of Ethics page, 29/03/19: sysco.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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"> • Met: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy down the whole AG supply chain: The Company indicates that it 'has established a Global Supplier Code of Conduct (Supplier COC), which describes the legal, moral, and ethical standards we expect from suppliers, including the protection of human rights. [...] The updated Code is being communicated via multiple channels and applies to all suppliers throughout our

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>global operations. Additionally, our Fiscal Year 2019 annual Global Code of Conduct training includes associate training on human rights'. Also, the company states that it 'requires each of its suppliers, and each of their subcontractors and supply chain providers that ultimately supply goods and services to Sysco (together, "you" or "your") to comply with this Supplier Code of Conduct (this "Code")'. However, it is not clear the steps it takes to communicate its human rights policy commitment(s) to direct suppliers and down the supply chain (or requires its suppliers to do so). [Sysco corporation supplier code of conduct: sysco.com & Sustainability Report 2018, 26/11/2018: investors.sysco.com]</p> <ul style="list-style-type: none"> • Not met: Requiring AG suppliers to communicate policy down the chain Score 2 • Not met: How HR commitments made binding/contractual • Not met: Including on AG suppliers
B.1.5	Training on Human Rights	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"> • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Not met: Trains relevant AG managers including procurement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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"> • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • Met: Monitoring AG suppliers: 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. UL's Responsible Sourcing group, a global independent social compliance assessment provider and key Sysco partner, has conducted assessments on Sysco's behalf since 2008. (...) In Fiscal Year 2018, there were 160 assessments conducted in 17 countries. This total included 26 initial audits and 134 assessments of facilities that had been assessed in the preceding year. Of the suppliers that have participated in the program for multiple years, 20 percent demonstrated improvement when compared to the previous audit. Additionally, nine facilities achieved a perfect score. We will continue to work with our suppliers to identify and minimize human rights risks in their operations'. [Social compliance on website: sustainability.sysco.com & Sustainability Report 2018, 26/11/2018: investors.sysco.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The Company states that 'we score facilities on a four-point scale from green (highest) through yellow, orange and red (lowest). Unless a supplier receives a perfect score, assessments are repeated every 12 months. A red rating does not necessarily mean a supplier has committed a critical violation; it can reflect a number of minor assessment criteria infractions. To help suppliers improve their performance, we work with those who do not achieve perfect scores to develop improvement plans, then conduct follow-up assessments to ensure that plans have been implemented'. However, no evidence found in relation to number of incidences. [Social compliance on website: sustainability.sysco.com] • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored
B.1.7	Engaging business relationships	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"> • Met: HR affects AG selection of suppliers: The supplier Code of Conduct indicates that "To meet this standard, Sysco requires each of its suppliers, and each of their subcontractors and supply chain providers that ultimately supply goods and services to Sysco to comply with this Supplier Code of Conduct". In addition the company indicates that "Sysco will only initiate and renew contractual relationships with suppliers that do not violate basic human rights". [Sysco corporation supplier code of conduct: sysco.com] • Met: HR affects on-going AG supplier relationships: The supplier Code of Conduct indicates that 'If you violate this Code, Sysco may either terminate its business relationship with you, or may require the affected facility to implement a corrective action plan. Sysco will continue to develop its monitoring systems to assess and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>ensure compliance with this Code'. [Sysco corporation supplier code of conduct: sysco.com & Human Rights: sustainability.sysco.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above • Not met: Working with AG suppliers to improve performance: The company indicates that based on assessment findings during their compliance assessment, 'we work with Sysco Brand suppliers and processors that do not achieve perfect scores to develop and implement improvement plans'. The company reports supply chain monitoring and implementation of corrective actions. Also, 'Sysco is a member of the Seafood Task Force, an organization that includes retail, foodservice, and NGO representation. The task force's mission is to strengthen worker well-being and compliance with laws governing the seafood supply chain by implementing a track and trace international verification system from vessel to feed mill; developing a standard code of conduct model for ports, brokers, and vessels; and supporting FIPs to mitigate the effects of overfishing, which can contribute to human rights abuses in the shrimp supply chain'. However, no evidence found of general work carried out with business relationships to improve human rights performance. [Sysco corporation supplier code of conduct: sysco.com & Sustainability Report 2018, 26/11/2018: investors.sysco.com]
B.1.8	Approach to engagement with potentially affected 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"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Workers in AG SC engaged • Not met: Communities in the AG SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not met: Identifying risks in own operations • Not met: Identifying risks in AG suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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"> • 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'. [Human Rights: sustainability.sysco.com] • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
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"> • Not met: Action Plans to mitigate risks • Not met: Including in AG supply chain • 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 " <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</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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: sysco.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
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"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
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"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

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"> • 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: sysco.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • 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: sysco.com] • 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: sysco.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> 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 ethicsline.sysco.com. [Sysco Global code of conduct, June 12, 2017: sysco.com] Score 2 <ul style="list-style-type: none"> 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: sysco.com & Ethics line website: ethicsline.sysco.com] Not met: Expects AG supplier to have community grievance systems 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". [Sustainability Report 2018, 26/11/2018: investors.sysco.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Engages users to create or assess system Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> Not met: Engages with users on system performance Not met: Provides user engagement example on performance Not met: AG suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Response timescales Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Public statement prohibiting retaliation: 'We strive to create an environment where associates feel comfortable to raise concerns and are confident that those concerns will be addressed. Sysco prohibits retaliation against anyone who reports a concern in good faith or who participates in an internal or external investigation'. [Sysco Global code of conduct, June 12, 2017: sysco.com] Met: Practical measures to prevent retaliation: The Company indicates that 'If you think that you or someone you know has experienced retaliation, contact any of the resources in the "Voice Concerns" section of the Code'. In addition, it is indicated that 'You may remain anonymous if you so choose, except where restricted by local law'. Finally, the Ethics Line is operated by an independent third party. [Sysco Global code of conduct, June 12, 2017: sysco.com] Score 2 <ul style="list-style-type: none"> Not met: Has not retaliated in practice Met: Expects AG suppliers to prohibit retaliation: The Supplier Code of Conduct indicates that 'You will have a no retaliation policy that allows your employees to speak with any Sysco employee without fear of retaliation by your management'. [Sysco corporation supplier code of conduct: sysco.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> Not met: Will work with state based or non judicial mechanisms Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Describes how remedy has been provided: The company indicates that 'Sysco is committed to playing a constructive role in addressing this serious issue

Indicator Code	Indicator name	Score (out of 2)	Explanation
	incorporating lessons learned		(human rights concerns in the seafood supply chain) and will engage with interested stakeholders to develop and implement meaningful, practical and effective solutions'. However no description has been found of the approach taken to provide remedy for victims. [Human Rights: sustainability.sysco.com] <ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices): No evidence found in relation to positive incentives via purchasing practices to encourage respect for human rights in the supply chain. [Sysco corporation supplier code of conduct: sysco.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to manufacturing sites (factories or fields): However, the company indicates that 'As part of our membership in the Task Force, Sysco is working to map its Sysco Brand seafood supply chain'. [Human Rights: sustainability.sysco.com] Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of SP and why
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: The Supplier code of conduct indicates that 'All of your employees will be of legal age established by local law. If the local law does not set a minimum age, your employees must be at least fourteen (14) years old. You must maintain official and verifiable documentation of each of your employee's date of birth, or if documentation is not available, have a legally recognizable means of confirming your employees' age. An exception to this is legitimate workplace apprenticeship programs, which comply with all laws and regulations. Except where local law allows, workers under the age of eighteen (18) should not perform hazardous work and may be restricted from night work with consideration given to educational requirements. More details can be found in ILO Convention No. 138'. However, no evidence found in relation to remediation programmes. [Sysco corporation supplier code of conduct: sysco.com & Sustainability Report 2018, 26/11/2018: investors.sysco.com] • Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Debt and fees rules in codes or contracts: The Supplier code of conduct indicates that 'You shall not require workers to pay recruitment and/or hiring-related fees to employers, agents or labor broker outside legally allowed fees. All fees charged to workers must be disclosed in advance and documented in a language that the workers understand'. However no evidence has been found of guidelines that include refraining from imposing any financial burden. [Sysco corporation supplier code of conduct: sysco.com] • Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Free movement rules in codes or contracts: The Global Supplier Code of Conduct states ' "Foreign or Migrant Workers – If foreign or migrant workers are working for you, you must follow the labor and immigration laws of the host country. Before hiring, the basic terms of the employment must be provided to the workers in a language they understand. Workers will be able to keep their own passports and other forms of personal identification, which are never to be withheld by you or any third party." [Sysco corporation supplier code of conduct: sysco.com] Not met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: FoA & CB rules in codes or contracts: The Supplier code of conduct indicates that 'You will give your employees the right to freely associate and organize and to legally bargain collectively. More information can be found in ILO Conventions Nos. 87 and 98'. However, no explicit guidelines found against intimidation or harassment against union members or representatives. [Sysco corporation supplier code of conduct: sysco.com] Not met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Sets out clear Health and Safety requirements: The Supplier code of conduct 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'. However no evidence has been found of specific clear health and safety requirements. [Sysco corporation supplier code of conduct: sysco.com] Not met: Injury Rate disclosures Not met: Lost days or near miss disclosures: The company indicates that it "monitors this information but does not publicly report it at this time". [Sustainability Report 2018, 26/11/2018: investors.sysco.com] Not met: Fatalities disclosure Score 2 <ul style="list-style-type: none"> Not met: How working with suppliers on H&S Not met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Rules on land & owners in codes or contracts Not met: How working with suppliers on land issues Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Rules on water stewardship in codes or contracts: The company indicates that "Although we are not a significant water user, we do use water for refrigeration systems, washing vehicles and landscaping. We have identified water-saving opportunities including recycling water from vehicle washing stations and refrigeration units and using rainwater for landscaping at our offices." However no evidence has been found of water guidelines in the contractual arrangements. [Warehouse & Distribution Centers: sustainability.sysco.com] Not met: How working with suppliers on water stewardship issues Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Women's rights in codes or contracts Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress

E. Performance: Responses to Serious Allegations (20% of Total)

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, and so the score of 14.92 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.73 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.14 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Sysco made data public that met one or more elements of the methodology in 12 cases, leading to a disclosure score of 1.14 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The company has a GRI Standard Index. [Sustainability Report 2018, 26/11/2018: investors.sysco.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Sysco met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

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

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this

disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

As CHRB Ltd, 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.