



# News Media and External Communications Policy<sup>1</sup>

## PURPOSE

Consistent with the Sysco Disclosure Policy, the purpose of this News Media and External Communications Policy is to establish and communicate requirements and authorizations for speaking with the news media and/or other external audiences on behalf of or about Sysco.

## SCOPE

This Policy is an enterprise-wide policy and applies to all employees (hereinafter collectively referred to as “you”) of Sysco Corporation and its subsidiaries (collectively, “Sysco”). Compliance with this Policy is a requirement of employment. This Policy also applies to all third parties performing services on Sysco’s behalf. For such third parties, compliance with this Policy is a condition of access to Sysco facilities and resources, and of being permitted to perform services for Sysco.

## POLICY STATEMENT

The authorized spokespersons of Sysco Corporation are the Chairman of the Board of Directors; Chief Executive Officer; Executive Vice President and Chief Financial Officer; Executive Vice President, Administration and Corporate Secretary; Senior Vice President and Chief Communications and Government Relations Officer; and Vice President, Investor Relations and Communications.

From time to time as necessary, Sysco’s authorized spokespersons may designate other corporate officers, operating company officers, associates or third parties (such as approved public relations agencies) to respond to specific inquiries from the news media or other external parties.

Only authorized spokespersons and others designated by them are authorized/permitted to speak with the news media or other external audiences on behalf of or about Sysco. Sysco officers and associates who are not authorized spokespersons are instructed to refer all calls from the news media, investment community, stockholders, individual investors and other external parties to the following contacts for handling:

### Authorized News Media and Investor Contacts

Vice President, Investor Relations and Communications	Neil Russell	<a href="mailto:russell.neil@corp.sysco.com">russell.neil@corp.sysco.com</a> 281-584-1308
Senior Director, External Communications	Shannon Mutschler	<a href="mailto:mutschler.shannon@corp.sysco.com">mutschler.shannon@corp.sysco.com</a> 281-584-4059

This Policy also applies to associates and third parties (including contractors, vendors and suppliers) making presentations or participating in panel discussions about Sysco at public and industry events; publishing information about Sysco that may become widely accessible in the public domain; and/or writing letters of endorsement or support for customers, suppliers, advocacy groups or other third parties on behalf of Sysco. These types of public external communications must be reviewed and approved by the Communications Department, Investor Relations Department and the Legal Department a minimum of two weeks prior to the event, publication or transmittal of such material.

<sup>1</sup> This policy is derived from select sections of the Sysco Disclosure Policy.

This Policy **does not apply** to ongoing private commercial dialogue with customers, suppliers, industry organizations and other third parties in the normal course of conducting business where there is no plan or intent for the information to become widely available to the news media or other public audiences.

Operating company presidents, specialty company presidents, and corporate officers are responsible for notifying their associates and ensuring that they are familiar with, understand and comply with this policy.

Please refer to Sysco's **Social Media Policy** for guidance in that area.

#### **ASKING QUESTIONS**

Whenever you have questions about this Policy or are unsure about its requirements, you must get the help you need to be able to comply with the Policy's requirements. To learn more about news media and other external communications in accordance with this Policy, contact Sysco Communications or Investor Relations. You may also ask your direct supervisor or Human Resources business partner for guidance, although these parties have no authority to approve communications with the news media or other external audiences.

#### **REPORTING & INVESTIGATIONS**

It is very important that you immediately report any known or suspected violations of this Policy. To do so, contact Sysco Communications, Investor Relations or Legal Department, your direct supervisor or another member of management, your Human Resources business partner, or the Ethics Line, a confidential toll-free third party-operated telephone service. You may also submit a report via the Ethics Line website: <http://ethicsline.sysco.com>, a confidential web-based online reporting vehicle. Anyone reporting a suspected or actual violation of this Policy in good faith is protected from retaliation under Sysco's Code of Conduct. You must cooperate with all investigations of alleged Policy violations.

#### **DISCIPLINE & OTHER CONSEQUENCES**

Employees who violate this Policy are subject to appropriate disciplinary action or other remedial measures up to and including termination of employment if warranted under the circumstances and permissible under applicable law. Assigned workers and third parties who violate this Policy are subject to being denied access to Sysco facilities, personnel and assets, and permission to perform services on Sysco's behalf.

#### **WAIVERS**

The provisions of this Policy will not be waived.

#### **REVISION & REVOCATION**

This Policy is not a contract between Sysco and any employee, assigned worker, or third party. This Policy may be revised or revoked by the Policy Owner at any time, without advance notice or cause.

#### **LOCAL POLICIES & PROCEDURES**

Sysco operates in many countries, and it is Sysco's intention to comply with all applicable legal requirements. Accordingly, if a provision of this Policy conflicts with applicable local legal requirements, Sysco may adopt regional or country-specific policies on this subject to accommodate local conditions or legal requirements; you must comply with all applicable local laws, regulations, policies and procedures.

#### **POLICY REVIEW AND REVISION**

This policy will be reviewed annually or more frequently as required by changes in legal, regulatory or Sysco requirements, or to correct identified deficiencies.

This policy supersedes all previous versions.

Executive Policy Owner	VP Investor Relations & Communications
Policy Owner:	Director External Communications
Prepared By:	VP Investor Relations & Communications
Effective Date:	January 21, 2018
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Version No.	
Reason for Revision	