

## **THE CHEFS' WAREHOUSE, INC.**

### **Human Rights Policy**

The Chefs' Warehouse, Inc. is a distinguished specialty food distributor dedicated to providing artisanal and high-quality food products to the communities we serve. At The Chef's Warehouse, Inc. we believe that all individuals should be treated with dignity, fairness and respect. Ensuring the health and safety of our associates, customers and stakeholders is at the core of our values. Our commitment to this policy is an integral part of our business and helps us to deliver long-term, sustainable financial performance. By upholding fundamental human right principles, we aim to contribute to the betterment of society while meeting the needs and expectations of our shareholders.

In accordance with the United Nations (UN) Guiding Principles on Business and Human Rights, The Chefs' Warehouse, Inc. developed this policy guided by the content of the Universal Declaration of Human Rights. This policy applies to The Chefs' Warehouse, Inc. as a whole, including our divisions and operations, as well as areas in which we have direct influence. We recognize that upholding human rights is a moral and ethical imperative that requires proactive and continuous effort. Therefore, we are dedicated to fostering a workplace culture that respects and upholds the dignity, rights, and well-being of every individual. This commitment extends not only to our employees but also to our suppliers, contractors, private security forces and other business partners.

#### **We adhere to internationally recognized human rights and principles reflected in:**

- the United Nations (the "UN") Universal Declaration of Human Rights;
- the UN Guiding Principles on Business and Human Rights;
- the UN Declaration on the Rights of Indigenous Peoples;
- the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work;
- the International Labor Organization's Declaration on the Rights of Indigenous Peoples in Convention No. 169;
- the OECD Guidelines for Multinational Enterprises; and
- the Consumer Goods Forum Resolution on Human Rights and its Priority Principles.

#### **Community and Stakeholder Engagement**

We understand that we do business in the context of a broader community. To truly bring our values to life, we recognize the importance community outreach and social responsibility programs as a means to make a positive impact in the areas where we operate. By collaborating with national, regional, and local stakeholders, we establish a collective approach to community outreach and social responsibility and benefit from their expertise, guidance, and support. Together, we strive to create sustainable, impactful programs that address pressing issues, support shared goals, and foster a stronger, more resilient society. We are committed to making a positive difference in the communities where we operate, guided by the valuable insights and collaborative efforts of our stakeholders.

We understand that the needs of communities can vary significantly, and therefore, our programs are designed to evolve at the local level based on the specific needs we identify and our ability to respond effectively. We believe that leadership plays a crucial role in setting the tone and exemplifying our values throughout the organization. By nurturing strong partnerships with local stakeholders, we create an environment that encourages open dialogue, fosters innovation, and enables the sharing of best practices.

Through these partnerships, we can collectively address the needs of our employees, customers, and communities. We work together to develop initiatives and programs that align with our values and have a positive impact on the lives of individuals we serve.

To ensure the effective implementation of this policy, we provide clear guidance, training, and resources to our employees and business partners. We will work collaboratively with them to identify and address any potential human rights risks and impacts associated with our operations. Through ongoing communication and engagement, we will foster a shared understanding and commitment to the principles outlined in this policy.

We will regularly assess our performance, monitor our progress, and take appropriate actions to improve our practices. We are committed to transparency and will report on our efforts and achievements in promoting and protecting human rights within our sphere of influence.

### **Diversity and Inclusion in the Workplace**

We understand that fostering an inclusive culture that embraces diversity of thought, background, and expertise is a key driver of our success. We recognize that by embracing and leveraging the diverse backgrounds, perspectives, and talents of our associates, we can better serve our customers, create innovative solutions, and contribute positively to the communities in which we operate. We are committed to cultivating an environment where every associate is valued, empowered, and able to make meaningful contributions to our business objectives, thus enabling us to thrive as a socially responsible and successful organization.

We are committed to providing equal employment opportunities to all individuals. We do not discriminate on the basis of actual or perceived race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, disability or handicap, pregnancy, sex, gender identity or expression, marital status, veteran status, military status, sexual orientation, arrest record, genetic information or any other characteristic protected by applicable federal, state or local laws, embracing diversity as a fundamental value of our business. By removing barriers and fostering an inclusive environment, we create a workforce that reflects the diversity of our communities and enables us to thrive as an organization. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and general treatment during employment. We rely on each member of our organization to actively reinforce our dedication to building an inclusive culture that not only embraces but celebrates and values the contributions of all individuals. We extend this commitment beyond our immediate workforce and seek to engage our Business Partners, third-party contractors, and other stakeholders, encouraging them to align with our values and actively promote inclusivity in their own operations.

To cultivate an inclusive culture and embrace diverse associates, we are fully committed to maintaining workplaces that are free from any form of discrimination or harassment. We are dedicated to fostering a work environment where everyone feels safe, respected, and valued, both within the workplace and in any work-related circumstances. Discrimination or harassment of any kind is not tolerated within our organization, and we take prompt and decisive action to address and rectify any instances of disrespectful or inappropriate behavior, unfair treatment, or retaliation.

We are committed to fostering economic inclusion and promoting equitable opportunities within our supply chain. We recognize that supplier selection plays a vital role in driving economic growth and social progress. We strive to foster supplier diversity by actively seeking to engage with suppliers that are owned by underrepresented groups, including but not limited to suppliers by women, suppliers owned or

staffed by members of vulnerable, marginalized or underrepresented social groups, as well as small and medium-sized suppliers. We create an inclusive and competitive environment that encourages the participation of diverse suppliers in our procurement processes.

**To align our actions with this policy:**

- We do not use and condone the use of slave labor or human trafficking;
- We denounce any degrading treatment of individuals or unsafe working condition, and support our products being free of conflict minerals;
- We ask that our suppliers and direct contractors demonstrate, in consistency with our own standards, a serious commitment to the health and safety of their workers, operate in compliance with applicable laws, adhere to UN Guiding Principles on Business and Human Rights, and act in accordance with internationally recognized human rights;
- We compensate our employees competitively in agreement with applicable wage, work hours, overtime and benefit laws;
- We respect the freedom of association and collective bargaining;
- We acknowledge the importance of land rights and the principle of free, prior and informed consent (FPIC) advocating for its implementation by national authorities; and
- We are committed to supporting the protection of women’s rights and the right to water.

**Addressing Human Rights Impact**

Our dedication to human rights encompasses the implementation of robust internal and external procedures designed to identify, address, and mitigate any potential violations of these fundamental principles. To effectively uphold our commitment, we have established a comprehensive set of guidelines known as the "Code of Conduct for Suppliers" and the "Code of Business Conduct and Ethics." These codes serve as powerful tools that align with our overarching vision of continuous improvement in adhering to the principles enshrined in our human rights policy.

Our "Code of Conduct for Suppliers" lays out clear expectations and requirements for all our suppliers, emphasizing their responsibility to respect human rights. By adhering to the Code, our suppliers demonstrate their commitment to fair labor practices, non-discrimination and other critical aspects that safeguard human rights. We actively engage with our suppliers, fostering open dialogue and collaboration to ensure their alignment with our values. We reserve the right to audit compliance with this Code and ensure verification of stated claims. This audit includes human rights, with a specific focus on human trafficking and slavery. We audit our Suppliers annually and enforce the Code through a variety of audits if deemed necessary by the Company’s risk management processes, including third-party verification, access to facilities and relevant records, and any additional monitoring and enforcement measures the Company deems necessary on a case-by-case basis.

Our "Code of Business Conduct and Ethics" serves as a guiding framework for our employees, outlining the standards of behavior we expect from them. This code encompasses a wide range of ethical considerations, including the respect for human rights. It emphasizes the importance of treating all individuals with dignity, fairness, and equality, both within our organization and in our interactions with external stakeholders.

We understand that safeguarding human rights requires constant vigilance and adaptability. As such, we continuously evaluate and refine our internal and external procedures to address any emerging challenges and mitigate potential violations. We actively seek feedback from our employees, suppliers, and stakeholders, enabling us to stay informed about evolving human rights issues and implement necessary improvements.

Through these multifaceted efforts, we strive to create a culture of respect, integrity, and accountability. By embedding the principles of human rights in all aspects of our operations, we aim to not only meet our ethical obligations but also drive positive change in the broader business community. Our commitment to upholding human rights is unwavering, and we remain dedicated to continuous improvement in this vital area.

### **Implementation and Training**

To ensure the successful implementation of our human rights policies and procedures, we actively undertake efforts to raise awareness and provide comprehensive training programs on a variety of topics, including anti-discrimination, anti-human trafficking and slavery. These programs are designed to educate and equip participants with the necessary knowledge and skills to promote and protect human rights within their respective roles and responsibilities. Our training efforts extend across all levels of our organization, including employees responsible for supply chain management. We aim to cultivate a workforce that not only possesses the knowledge to identify potential human rights violations but also feels empowered to take appropriate actions to prevent and address such violations.

Continuous improvement is a core principle in our training approach. We regularly evaluate the impact and effectiveness of our training programs through feedback mechanisms and assessments. This allows us to identify areas for improvement and make necessary adjustments to ensure our training initiatives remain relevant and impactful. By prioritizing training as an essential element of our human rights practices, we foster a culture of awareness, understanding, and proactive engagement.

### **Salient human rights risks related to The Chefs’ Warehouse’s activities and business relationships:**

<b>SALIENT HUMAN RIGHTS ISSUES</b>	<b>KEY ASPECTS</b>
<b>TREATING WORKERS WITH RESPECT</b>	<ul style="list-style-type: none"> <li>• Pay; working hours</li> <li>• Freedom of association and collective bargaining</li> <li>• Meaningful opportunities for workers to be heard</li> </ul>
<b>PROMOTING A SAFE &amp; HEALTHY WORK ENVIRONMENT</b>	<ul style="list-style-type: none"> <li>• Occupational health and safety standards</li> <li>• Preventing workplace abuse</li> <li>• Healthy work environments</li> <li>• Access to water and sanitation</li> </ul>
<b>PROVIDING A FAIR &amp; INCLUSIVE WORK ENVIRONMENT</b>	<ul style="list-style-type: none"> <li>• Anti-discrimination and anti-harassment</li> <li>• Diversity and inclusion</li> <li>• Gender equity</li> </ul>
<b>COMBATING FORCED &amp; UNDERAGE LABOR</b>	<ul style="list-style-type: none"> <li>• Preventing forced labor, including debt bondage</li> <li>• Preventing underage labor</li> <li>• Preventing human trafficking</li> <li>• Responsible recruitment to protect vulnerability of migrant workers</li> </ul>

## **Mitigation Strategies**

We are committed to mitigating salient human rights risks and concerns, both within our organization and throughout our value chain. By implementing the following strategies, we aim to prevent and address human rights violations effectively:

- **Commitment to Human Rights:** We affirm our commitment to respecting and promoting human rights as outlined in this policy. We integrate human rights considerations into our decision-making processes and corporate culture.
- **Risk Assessments:** We conduct human rights risk assessments across our operations, supply chain, and business relationships. These assessments will identify and prioritize the salient human rights risks and concerns specific to our industry, geographical locations, and stakeholder groups. We maintain a robust supplier due diligence process to assess supplier practices, engaging in dialogue with suppliers, and providing guidance and support to promote compliance.
- **Training Programs:** We implement comprehensive training programs to raise awareness among our employees about human rights risks, standards, and the importance of compliance. These programs will provide practical guidance on identifying, preventing, and addressing human rights violations.
- **Grievance Mechanisms:** We established accessible and effective grievance mechanisms to provide channels for individuals and stakeholders to raise human rights concerns. These mechanisms allow for confidential reporting, impartial investigation, and appropriate remediation in cases of human rights violations.
- **Collaboration and Engagement:** We engage and collaborate with relevant stakeholders. This collaboration informs our risk assessments, enhances our understanding of local contexts, and fosters dialogue for continuous improvement.
- **Monitoring and Auditing:** We implement monitoring and auditing processes to assess compliance with our human rights policies and procedures. If deemed necessary, this includes both internal and external audits, such as independent third-party assessments, site visits, and reviews of relevant records.
- **Remediation:** In cases where human rights violations are identified, we take prompt action to remediate the situation, provide appropriate remedies to affected individuals or communities, and implement measures to prevent recurrence. We are committed to learning from past mistakes, continuously improving our human rights performance, and sharing best practices across our industry.

## **Governance and Reporting**

Our General Counsel and Board of Directors oversee the application of this policy. Our Environmental, Social and Governance committee has a formal schedule to meet regularly to assess the any applicable considerations relating to health and safety and social matters. Operational accountability rests with the operations team supported by members of the executive team, including the Chief Executive Officer and the General Counsel.

## **Concerns and Issues**

If you suspect or believe that another employee (including any part-time or temporary employee), consultant or contract worker, or one of our business units is violating this policy, you must report this to

the General Counsel. Concerns and violations may be reported anonymously 24 hours a day, 7 days a week and may be submitted via email at [aaldous@chefswarehouse.com](mailto:aaldous@chefswarehouse.com) or via telephone at 203.894.1345 ext. 10211.

All reports shall be treated confidentially to the fullest extent possible; however, in the course of any investigation, the Company may find it necessary to share information with others on a “need to know” basis. We understand that you may find it difficult to report suspected violations by those you work with; however, we must take steps to prevent and detect criminal or unethical conduct in order to avoid jeopardizing the welfare of the Company and all of its employees, customers and investors.

Last updated July 19, 2023.