

# THE CHEFS' WAREHOUSE, INC. WHISTLEBLOWER POLICY

## I. Statement of Policy

It is the policy of The Chefs' Warehouse, Inc.<sup>1</sup> (the "Company") to comply with the laws and regulations to which we are subject, as well as our Code of Business Conduct and Ethics (the "Code") and our other Company policies. Specifically, this Whistleblower Policy and the procedures set forth herein are intended to facilitate disclosures, encourage proper individual conduct and alert the Audit Committee of the Board of Directors (the "Audit Committee") to potential issues and concerns before encountering serious consequences.

## II. Administration

The Audit Committee has designated the Chairman of the Audit Committee to assist in the implementation and administration of this Whistleblower Policy. The current Chairman of the Audit Committee is Lester Owens. You may e-mail him at [auditcommitteechair@chefswarehouse.com](mailto:auditcommitteechair@chefswarehouse.com) or write to him at the following address: Attn: Lester Owens, 100 East Ridge Road, Ridgefield, CT 06877.

The Chairman of the Audit Committee will be assisted by the General Counsel in the administration of this Whistleblower Policy with respect to alleged misconduct by individuals other than executive officers and directors. The current General Counsel is Alexandros Aldous. You may e-mail him at [aaldous@chefswarehouse.com](mailto:aaldous@chefswarehouse.com) or write to him at the following address: Attn: Alexandros Aldous, 100 East Ridge Road, Ridgefield, CT 06877.

The Company has also established the following e-mail address which you may use to report alleged misconduct to both of Messrs. Owens and Aldous: [wb@chefswarehouse.com](mailto:wb@chefswarehouse.com).

## III. Reporting Alleged Violations and Concerns

### A. Methods of Reporting

If you suspect or reasonably believe that another employee (including part-time and temporary employees), consultant or contract worker or one of our business units is engaged in (i) possible misconduct regarding accounting, internal accounting controls or auditing matters, (ii) a possible violation of applicable law, regulation or Company policy, including a possible violation of the federal securities laws that has occurred, is ongoing or is about to occur or (iii) activities on our behalf that otherwise could damage our reputation, you should report this to the Chairman of the Audit Committee, the General Counsel, the Chief Financial Officer or one of the senior officers in our Human Resources Department. In addition, you are encouraged to raise any other issues or concerns you may have relating to compliance matters and ethical business practices, whether or not specifically addressed in our formal policies. **Do not assume that "senior management already knows" or that someone else will make the report.** Your supervisor or a senior officer in our Human Resources Department can help you make the report, if you would like assistance.

All reports shall be treated confidentially to the fullest extent possible and consistent with fair and rigorous enforcement of this Whistleblower Policy, the Code and applicable laws and regulations; 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

<sup>1</sup> References to the "Company" (or to "The Chefs' Warehouse, Inc." or to "we" or "our" or similar pronouns) in this Code of Conduct mean The Chefs' Warehouse, Inc. and all of its subsidiaries and affiliated companies. References to "Board of Directors" mean the Board of Directors of The Chefs' Warehouse, Inc.

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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.

**B. Reports May Be Made Anonymously**

We have established a hotline that allows you to make reports anonymously by telephone. You do not need to give your name to use the hotline, although you may if you so choose. The hotline reports will be monitored by the General Counsel, who will in turn forward claims to the Chairman of the Audit Committee as appropriate pursuant to this Whistleblower Policy. The hotline telephone number is (718) 684-8426. You may also make anonymous reports by writing to the Chairman of the Audit Committee or the General Counsel at the addresses provided in Section II above.

Anonymous reports should be accurate and based on a reasonable belief regarding possible misconduct regarding accounting, internal controls or audit matters or a possible violation of applicable law, regulation or Company policy, and should contain as much specific information as possible to allow the person investigating the report to adequately assess the nature, extent and urgency of the situation. Employees should realize that if an anonymous report cannot be properly investigated without additional information, we may have to close the matter for lack of sufficient information.

**IV. Non-Retaliation Policy**

Our commitment to conducting business in accordance with legal and ethical obligations requires an environment that allows employees to report known or suspected violations without fear of retaliation or retribution. No employee should be discouraged from using any available channel to raise his or her concerns. It is our intent to foster an environment where employees will choose whichever method they are most comfortable with to communicate their concerns.

<b><i>NON-RETALIATION POLICY</i></b>	
<p><i>We are committed to providing a workplace conducive to open discussions of our business practices. It is our policy to protect employees who make reports, in good faith, of potential violations of our Code of Business Conduct and Ethics, the policies in our Employee Handbook, other Company policies or applicable law. In addition, it is our policy to comply with all applicable laws that protect employees against unlawful discrimination or retaliation by their employer as a result of their lawfully reporting information regarding corporate fraud or other violations of law by the Company or its employees. For purposes of this policy, “retaliation” means any discharge, demotion, suspension, threatening, harassment, directly or indirectly, or other discrimination against an employee in the terms or conditions of his or her employment because of any such person’s good-faith reporting of alleged violations or concerns or participation in good faith in any investigation of any such alleged violation or concern.</i></p> <p><b><i>Any employee who retaliates against another employee for reporting problems will be subject to disciplinary action, which may include termination of employment. If an employee believes that he or she has been subjected to any action that violates this Non-Retaliation Policy, he or she should report that action to the Chairman of the Audit Committee, the General Counsel, the Chief Financial Officer or a senior officer in our Human Resources Department. This Non-Retaliation Policy applies even if an allegation that was made in good faith ultimately turns out to be groundless. However, employees who file reports or provide evidence that they know to be false or without a good faith belief in the truth of such information will not be protected by this Non-Retaliation Policy and may be subject to disciplinary action, including termination of their employment.</i></b></p>	

**V. Investigation of Suspected Violations**

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Upon receipt of any reported violation under this policy by any person other than an executive officer or director of the Company, the General Counsel will determine whether the information alleged in the report alleges or contains allegations that might constitute a violation of applicable laws and regulations, the Code or other Company policies. To the extent the General Counsel deems appropriate, the General Counsel will appoint one or more internal and/or external investigators to promptly and fully investigate such report under the supervision of the General Counsel. The General Counsel shall, to the extent deemed appropriate, consult with the Chairman of the Audit Committee and the Audit Committee with respect to conduct or results of any such investigation. The General Counsel will inform the reporting person (if his or her identity is known) that the report has been received and, to the extent appropriate, provide him or her with the name of, and contact information for, the investigator assigned to the report.

With respect to any other report pursuant to this policy, upon receipt of such report, the Chairman of the Audit Committee will determine whether the information alleged in the report alleges or contains allegations that might constitute a violation of applicable laws and regulations, the Code or other Company policies. The Audit Committee shall be notified promptly of reports of such alleged misconduct determined to involve accounting, internal accounting controls or auditing concerns or alleged violations of the Code by executive officers or directors of the Company. The Audit Committee will, to the extent it deems appropriate, appoint one or more internal and/or external investigators to promptly and fully investigate claims of alleged misconduct, under the supervision of the Chairman of the Audit Committee, or, in the case of (i) alleged misconduct relating to accounting, internal accounting controls or auditing concerns or (ii) alleged violations of the Code by executive officers or directors of the Company, under the supervision and oversight of the Audit Committee or such other persons as the Audit Committee determines to be appropriate under the circumstances. The Chairman of the Audit Committee will inform the reporting person (if his or her identity is known) that the report has been received and, to the extent appropriate, provide him or her with the name of, and contact information for, the investigator assigned to the report.

If the investigation confirms that misconduct has occurred, the Company will promptly take appropriate corrective action with respect to the person(s) involved, including possible termination of such person(s), and will also take appropriate steps to correct and remedy any misconduct.

## **VI. Retention of Reports**

All reports submitted by an employee regarding an alleged violation or concern, along with the results of any investigations relating thereto, shall be retained by the Company in accordance with applicable law. It is illegal and against the Company’s policy to destroy corporate audit records that may be the subject of or related to an investigation by the Company or any federal, state or regulatory governmental body.

## **VII. Yearly Whistleblower Reports**

In 2023, the Whistleblower Hotline received eleven calls. Ten of the logs were related to personnel matters. One call was not returned. All calls were fully investigated and corrective action was taken if merited.

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