

Sysco UK Tax Strategy

Scope

Sysco Corporation, acting through its subsidiaries and divisions, is the largest global distributor of food and related products primarily to the foodservice or food-away-from-home industry. Sysco operates in the UK primarily through the Brakes Group, but also has UK hotel supply operations. This strategy applies to all of Sysco's UK operations and encompasses all UK taxation, including but not limited to Income Tax, Corporation Tax, NIC, VAT, Insurance Premium Tax and Stamp Duty Land Tax. Any references to tax, taxes, or taxation are to UK taxation, and all corresponding worldwide taxes and similar duties with respect to which Sysco has legal responsibilities. Sysco is committed to full compliance with all statutory obligations and full disclosure to tax authorities. This strategy has been in place throughout the accounting period ended 30 June 2018.

Governance to UK taxation and Risk Management

Sysco is a US corporation with publicly traded equity securities listed on the New York Stock Exchange, and its assessment of internal controls is governed by the criteria set forth by the Committee of Sponsoring Organizations of the Treadway Commission in *Internal Control-Integrated Framework(2013) (the COSO criteria)*. Sysco's Board of Directors has the ultimate responsibility for Sysco's tax strategy and its compliance. Sysco's Audit Committee regularly monitors the integrity of Sysco's financial reporting system, internal controls, and risk management framework which expressly includes all elements relating to global taxation. The day-to-day management of Sysco's tax affairs is delegated to its Chief Financial Officer, Chief Accounting Officer, and Vice President of Global Taxation, who regularly update the Audit Committee on tax compliance and operational risks. In the UK, Sysco's European Senior Accounting Officer has the delegated responsibility of specific UK day-to-day tax matters. Sysco's Executive management team, including the UK team, as well as its Board of Directors, ensures that Sysco's tax strategy is one of the factors considered in all investments and significant business decisions.

Attitude toward tax planning and level of risk

Sysco manages its risk to ensure compliance with legal requirements in order to pay the right amount of tax. Sysco operates through subsidiaries, which are established in countries in which Sysco undertakes business operations or financing activities. All transactions between Sysco's companies are conducted at arm's length in accordance with Organization for Economic Cooperation and Development (OECD) principles and supported by appropriate documentation and studies. When entering business transactions, Sysco seeks to avail itself of available tax incentives, reliefs, and exemptions in line with tax legislation. Sysco does not undertake tax planning unrelated to its business transactions.

Relationship with HMRC

Sysco has a transparent and constructive relationship with HM Revenue & Customs through regular meetings and communication with respect to business developments including past, current, and future tax risks and the interpretation of the law in relation to all relevant taxes.