

C&S Wholesale Grocers, Inc. and Subsidiaries

Policy Title: Non-Discrimination, Anti-Harassment, Reasonable Accommodation, and Pay Transparency Non-Discrimination Provision

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Policy Owner: Executive Vice President, HR

Department Owner: HR

PURPOSE

Provides information to employees regarding discrimination and harassment, including the process for reporting an incident of discrimination or harassment

POLICY

The Company is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, the Company expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and harassment.

It is the policy of the Company to ensure employment opportunity without discrimination or harassment on the basis of an individual's race, color, religion, national origin, gender, age, sexual orientation, gender identity, or genetic information; or because he or she is an individual with a disability, a disabled veteran, veteran of the Vietnam era, recently separated veteran, other protected veteran, or Armed Forces Service Medal veteran; or on the basis of any other protected characteristic as established by law. The Company prohibits and will not tolerate any such discrimination or harassment. In addition, there will be no adverse action or retaliation against any individual for filing any legitimate complaint and/or testifying, assisting or participating in any investigation, proceeding or hearing. However, any employee who makes willful, malicious accusations that, upon investigation are found to be false will be disciplined accordingly, up to and including termination of employment. In states where more specific requirements must be met concerning training, posting of related information, etc., see facility bulletin boards or contact the Facility Human Resources Representative.

Anti-Harassment

The Company recognizes the importance of giving each employee, male or female, the opportunity to work and pursue his/her career at the Company in an environment which is free of discrimination in any form, including, but not limited to sexual harassment.

As part of the Company's continuing efforts to ensure equal opportunity for all employees and pursuant to the Equal Employment Opportunity Commission's guidelines on sex discrimination issued under Title VII of the Civil Rights Act of 1964, the Company has issued this policy prohibiting sexual harassment.

The Company strictly prohibits and will not tolerate its managers, supervisors, employees, customers, vendors or any other representative of the Company sexually harassing any other employee or representative of the Company. Sexual harassment is illegal under federal, state and local laws. Sexual harassment is defined as:

- **Making unwelcome sexual advances;**
- **Requesting sexual favors; or**
- **Engaging in verbal or physical conduct of a sexual nature, any of which is used as the basis for employment decisions or creates an intimidating, hostile or offensive working environment.**

Examples of harassment include, but are not limited to:

- **Verbal** - Sexual innuendos, suggestive comments, jokes of a sexual nature, sexual propositions, threats, whistling, lewd or profane speech
- **Visual** - Sexually suggestive objects or pictures, graphic commentaries, leering, obscene gestures
- **Physical** - Unwanted physical contact, touching, pinching, brushing up against, pushing, patting, grabbing.

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Verbal, physical and/or visual conduct of a sexual nature which may be viewed by some employees as good-natured fun may be viewed by other employees as extremely distasteful and offensive and will not be tolerated at The Company.

Other Harassment

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, physical and/or visual conduct that denigrates or shows hostility or aversion toward an individual or his/her relatives, friends or associates because of his/her/their race, color, national origin, religion, gender, sexual orientation, age, genetic information, disability, special disabled veteran/Vietnam Era veteran status and/or any other characteristic protected by law. This type of harassment has the purpose or effect of:

- **Creating an intimidating, hostile or offensive work environment;**
- **Unreasonably interfering with an individual's work performance; or**
- **Otherwise adversely affecting an individual's employment opportunities**

These policies apply to all applicants and employees, and prohibit harassment, discrimination and retaliation whether engaged in by fellow employees, supervisors, managers, or by someone not directly connected to the Company, such as an outside vendor, customer, consultant, etc. Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as business trips, business meetings, and business-related social events. Please refer to the e-mail policy as well for related conduct guidelines.

RESPONSIBILITY

If an employee feels that he/she is being subjected to harassment of any nature, he/she should immediately notify the Facility Human Resources Representative and any Director of Human Resources, or a member of the corporate HR leadership team to ensure prompt and effective action. Allegations of harassment will be thoroughly and expeditiously investigated. The question of whether a particular action or incident is prohibited behavior requires a determination based on all available facts. Confidentiality will be protected to every extent possible. Upon completion of the investigation, appropriate action will be taken, including corrective action or separation from the Company of the harassing party, if warranted.

The Company maintains a confidential, toll-free number for employees to call with any questions or concerns about business ethics issues or to report possible violations of the Company's Code of Conduct Policy. It is not required that any employee calling the Hotline leave his/her name; However the more specific information that can be given, the faster issues can be researched and resolved. The Hotline is generally staffed from 8 am to 5 pm Monday through Friday, or employees can leave a voicemail: 1-800-814-3759.

The Company Wholesale Grocers Inc. expects all employees to act responsibly to maintain a pleasant work environment, free of discrimination.

Reasonable Accommodation

Introduction

It is the policy of C&S Wholesale Grocers, Inc. and its subsidiaries and affiliates (together, the "Company") to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC) and the Office of Federal Contract Compliance Programs (OFCCP). Accordingly, the Company prohibits any and all types of discrimination against a qualified candidate for employment or employee on the basis of: (1) a current disability; (2) a record of a prior disability; (3) being perceived or regarded as disabled; or (4) a relationship or association with someone with a disability.

Specifically, it is the Company's policy not to discriminate against qualified candidates or employees with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment. Further, the Company will not tolerate any form of retaliation against a candidate for employment or an employee on the basis of a disability, a request for a reasonable accommodation, or participation in a complaint or investigation related to disability discrimination.

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Procedures

Candidates for Employment: When an individual with a disability requests accommodation and can be reasonably accommodated without creating an undue hardship or causing a direct threat to workplace safety, he or she will be given the same consideration for employment as any other applicant. **Candidates may request an accommodation either through the “We Select The Best” web portal or through local Human Resources (HR).**

Current Employees: The Company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation or if the accommodation creates an undue hardship to the Company. **Current employees should contact local Human Resources (HR) with any questions or requests for accommodation. Managers who receive a request for accommodation should contact local Human Resources promptly.**

Please note that all employees are required to comply with the company’s safety standards. Further, individuals who are currently using illegal drugs are excluded from coverage under this Reasonable Accommodation policy.

Pay Transparency Non-Discrimination Provision

The company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor’s legal duty to furnish information.