



BEN E. KEITH COMPANY
EQUAL EMPLOYMENT OPPORTUNITY POLICY

March 1, 2018

Ben E. Keith Company maintains a continuing policy of non-discrimination in employment. Ben E. Keith Company is an equal opportunity employer and complies with all applicable laws prohibiting discrimination based upon race, color, sex, age, religion, national origin, sexual orientation, gender identity, as well as any other category protected by law. Furthermore, it is our policy to provide equal opportunity to individuals with disabilities and protected veterans in all phases of the employment process and in compliance with applicable federal, state, and local laws and regulations. This policy of non-discrimination shall include, but not be limited to, the following employment decisions and practices: recruiting, hiring; promotions; demotions or transfers; layoffs; recalls; terminations; rates of pay or other forms of compensation; selection for training, including apprenticeship; and recruitment or recruitment advertising.

Ben E. Keith Company will provide reasonable accommodations to any employee or applicant with a known disability who is otherwise qualified to perform the essential functions of the job. An employee or applicant who believes that he or she requires a reasonable accommodation because of a disability must notify Human Resources of the issue so that an interactive dialogue can begin on the subject of a proposed accommodation. Any employee or applicant whose religious beliefs or practices conflict with his or her job schedule, with the Company's policy or practice on dress and appearance, or with other aspects of employment, and who seeks a religious accommodation must notify Human Resources of the conflict and the employee's proposed accommodation. Ben E. Keith Company respects the religious beliefs and practices of all employees and applicants, and the Company will attempt to provide reasonable accommodations to such beliefs and practices.

Employees and applicants will not be subjected to discrimination, unlawful retaliation or harassment because they have requested an accommodation due to a disability or religious belief or practice. Employees and applicants of Ben E. Keith Company will not be subjected to any form of harassment, discrimination, or retaliation for exercising rights protected by, or because of their participation in an investigation or compliance review related to, Executive Order 11246, Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act, the Americans With Disabilities Act, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998, or any other federal or state non-discrimination law, rule, or regulation.

If you believe that you have been discriminated against in any manner as described above, you should notify Mike Rowell, employed as Vice President – Human Resources. Ben E. Keith Company will continue to direct management personnel to take such action as may be required to prevent behavior prohibited by this policy. All matters will be investigated and appropriate disciplinary action will be taken, up to and including termination of employment, if necessary. Retaliation against anyone who complains of or witnesses behavior contrary to this policy is also prohibited.

Ben E. Keith Company also maintains affirmative action programs to implement our equal employment opportunity policy, including for disabled individuals and protected veterans. Employees or applicants who wish to review appropriate portions of these programs may schedule an appointment to do so by contacting the Human Resources office Monday – Friday from 8:00 a.m. until 5:00 p.m.

Robert G. Hallam
Chief Executive Officer