



Harassment and Discrimination Policy

This policy addresses Vistar Eye Center's ("Vistar") commitment to maintaining a work environment that is free from any conduct that could be deemed as harassment, bullying and/or discrimination. In pursuit of this goal, Vistar adheres to all applicable federal, state, and local laws and regulations regarding harassment and discrimination, including, but not limited to, sexual harassment, in the workplace. This policy applies to all employees, consultants, contractors, vendors, temporary employees, and any other individuals having a business relationship with Vistar.

It is Vistar's intent that this policy represents "zero tolerance" for inappropriate conduct. Vistar understands and recognizes that not all conduct by an alleged wrongdoer is intended to be harassing or otherwise in violation of this policy, however under all circumstances prompt, remedial action will be taken to address the conduct and to take reasonable efforts to ensure that it does not reoccur. As discussed herein, disciplinary action may be taken as needed to address unwelcome conduct, which can be up to and including termination.

Equal Employment Opportunity Policy

Vistar provides equal opportunity in all of its employment practices to all qualified employees and applicants without regard to race, color, religion, sex, sexual orientation, gender identity, age, national origin, citizenship status, disability, pregnancy, childbirth, or a medical condition related to pregnancy or childbirth, marital status, genetic information, veteran status, or any other characteristic protected by federal, state, or local law. This policy applies to all aspects of the employment relationship, including recruitment, hiring, compensation, promotion, transfer, disciplinary action, termination, training, and social and recreational programs. All such employment decisions will be made without unlawful discrimination on any prohibited basis. If employees believe they are or have been subject to unfair treatment in violation of this policy, or if they have any questions concerning this policy, they should report such questions or concerns to their supervisor, any member of management, or Human Resources. Vistar encourages such reporting and will not tolerate any form of retaliation against any individual for involvement in reporting or investigation of such claims.

Discrimination

Discrimination includes any act or omission that directly or indirectly results in the denial of equal treatment or opportunity of an employee based on a protected characteristic, as

well as employer decisions impacting the terms or conditions of employment based on protected characteristics. Employees who believe they are subject to any form of conduct that may be in violation of this policy should report such behavior as soon as possible.

Vistar will not discriminate against qualified individuals with disabilities—including pregnancy, childbirth, or related medical conditions—with regard to any aspect of their employment. Vistar recognizes that some individuals with disabilities may require workplace accommodations. If employees need an accommodation or experience difficulty performing their job duties due to a disability or pregnancy, they should contact their supervisor or Human Resources to discuss reasonable accommodations that may enable them to perform the essential functions of their job.

Harassment

Vistar strives to ensure that its workplace remains free from harassment and discrimination. In addition, Vistar prohibits harassing conduct against anyone for involvement in reporting or investigation of such claims.

Harassment includes acts or omissions related to a person's protected characteristic that unreasonably interfere with an employee's work performance or directly or indirectly create an intimidating, hostile, or offensive work environment. Conduct violating this policy may include any of the following:

- Verbal (written or oral) conduct, such as inappropriate comments, epithets, explicit or derogatory language;
- Visual conduct, such as inappropriate gestures, mimicry, pictures, staring, or leering;
- Associational conduct, such as shunning, segregating, making and acting on unfounded assumptions about persons based on their membership in a protected classification;
- Inappropriate digital or electronic conduct, including text messages, e-mails, direct messages, social media posting and other unwelcome and offensive conduct across various digital and electronic media; and/or
- Physical conduct, which may include any offensive and unwanted touching.

Sexual harassment includes any unwelcome physical or verbal conduct of a sexual nature, particularly where:

- Submission by an employee to such conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; or
- Such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment.

While sexual harassment encompasses a wide range of conduct, some examples of specifically prohibited conduct include:

- Physical assault;
- Sexual advances and requests;
- Repeated requests for dates;
- Sexually suggestive or degrading jokes, comments, and innuendo;
- Comments regarding an employee's physical appearance, sexual activity, or history;
- Sexually suggestive objects or pictures; or
- Leers, stares, or gestures.

In addition, this policy prohibits offensive or unwelcome sexual propositions, verbal abuse of a sexual nature, graphic comments about an individual's body, sexually degrading comments, and sexually suggestive objects, pictures or other materials in the workplace.

Such conduct may constitute sexual harassment regardless of whether the conduct occurs between members of management, between management and employees, between employees, or directed at employees by non-employees conducting business with Vistar, regardless of gender or sexual orientation.

Complaint Procedures

If employees believe that they have been subjected to or witnessed conduct that could be deemed as harassment or discrimination, they should immediately report such conduct to their supervisor or Human Resources. Should any employee believe it would be inappropriate to discuss the matter with their direct supervisor, the employee may report it directly to any member of management. Any employees found to have engaged in such wrongful behavior will be subject to appropriate discipline, which may include termination.

Every effort will be made to promptly and thoroughly investigate all allegations of harassment and discrimination in as confidential a manner as possible and appropriate corrective action taken if warranted. If Vistar determines that any employee has violated this harassment and discrimination policy, appropriate disciplinary action will be taken against the offending employee(s), up to and including termination of employment. We will periodically follow-up with the complainant to ensure that the actions taken by Vistar have remedied any problems and that the issues that prompted the complaint have not recurred.

Retaliation

Vistar prohibits any form of retaliation against an employee who makes a bona fide complaint of harassment or discrimination under this policy, opposes any conduct or

practice involving harassment or discrimination, or participates in the investigation of such complaints.

Vistar does not discourage or obstruct anyone from filing complaints with the federal Equal Employment Opportunity Commission or state or local EEO agency.