

Equal Employment Opportunity Policy

PURPOSE

To ensure that all Associates and individuals doing business with or for the Company are treated in accordance with the mission and values of the organization and to ensure compliance with federal, state, and local regulations and statutes.

APPLICABILITY

The policy applies to Peapod Digital Labs LLC ("PDL" or "the Company").

ELIGIBILITY/SCOPE

All associates and individuals including vendors and customers doing business with or on behalf of the Company.

POLICY

It is the Company's policy to provide equal employment opportunity to all individuals. In accordance with this policy, decisions regarding employment and advancement at the Company are based on qualifications and merit, considering business needs. The Company strictly prohibits discrimination against any individual based on Protected Characteristics.

This policy applies to all aspects of employment, including selection, hiring, compensation, promotion, job assignment, discipline, termination of employment, access to benefits and training, and any other terms or conditions of employment.

Further, it is the Company's policy to provide an environment that is free of unlawful discrimination and harassment of any kind. Also, retaliation is strictly prohibited against any individual who makes a good faith complaint of discrimination or harassment, or against any individual who participates in an investigation of such a complaint, or any other form of retaliation prohibited by law.

The Company will make reasonable accommodations, as required by law, for qualified individuals with known legally recognized disabilities, pregnancy (including childbirth and related medical conditions), and for Associates' practices related to sincerely held religious beliefs, unless doing so would result in an undue hardship to the business. An individual requiring such accommodation is encouraged to speak to their Manager or contact Human Resources for assistance.

All officers, Managers, and supervisors of the Company are expected to cooperate in implementing and upholding these policies. Anyone who violates these policies or engages in any type of unlawful discrimination, harassment, or retaliation will be subject to disciplinary action, up to and including termination of employment.

Any individual who believes that there has been a violation of this Policy must report their concerns to any Manager or Human Resource representative. The Company will investigate and respond to complaints in a fair and expeditious manner. Investigations will be conducted in a manner that maintains confidentiality to the extent practicable under the circumstances and permitted by law. An individual may also report their concerns or seek information or clarification regarding the provisions of this Policy by contacting the Human Resources Department, or the Company's confidential reporting line: (888) 310-7715. These reports may be made anonymously.

The federal enforcement agency is the Equal Employment Opportunity Commission, phone number (800) 669-4000.

DEFINITIONS

Protected Characteristics: *Under this policy, the following are considered protected characteristics: sex, race, color, ancestry, national origin, citizenship status, religion, age, marital status, military service, veteran status, pregnancy (including childbirth and related medical conditions), genetic information, sexual orientation, gender identity and expression, legally recognized disability, domestic violence victim status, and any other characteristic protected by applicable federal, state, or local law.*

POLICY OWNER

This policy is administered and owned by the Human Resources Department.