



Effective Date: March 2016	Policy Group Owner: Human Resources
Policy Title: EQUAL EMPLOYMENT OPPORTUNITY - US	

POLICY STATEMENT

Veritiv is proud to be an equal opportunity employer and is committed to providing equal employment opportunities to all employees and employment applicants without regard to race, ethnicity, ancestry, color, religion, religious creed, gender, sex, sexual orientation, marital status, age, physical or mental disability, gender identity or expression, genetic information, national origin, protected military or veteran status or any other classification protected by law. Veritiv promotes a workplace culture of dignity and respect for all employees as well as a safe, appropriate, and productive work environment. Accordingly, the Company prohibits unlawful harassment and discrimination on the basis of any characteristic protected by law.

This Equal Employment Opportunity Policy sets forth Veritiv's policies against unlawful discrimination and harassment, including the standards to which Veritiv employees must comply and the complaint procedures employees must follow when they believe a violation of this Policy has occurred. Every employee is required to follow our policies against unlawful discrimination and harassment and to bring to the Company's attention any action that does not comply with those policies or our commitment to equal employment opportunity.

POLICY

A. Prohibition Against Discrimination and Harassment

Veritiv provides equal employment opportunity to all employees and applicants. Discrimination or any type of harassment against any Veritiv employee or job applicant because of race, ethnicity, ancestry, color, religion, religious creed, gender, sex, sexual orientation, marital status, age, physical or mental disability, gender identity or expression, genetic information, national origin, protected military or veteran status, or any other classification protected by law is prohibited. All actions relating to any aspect of employment – such as recruitment and hiring, training and development, compensation and benefits, transfer and promotion, discipline and discharge – will be free of any such discrimination.

This policy applies to all employees at all locations, including supervisors and managers, as well as third parties such as temporary workers, contractors, consultants, vendors and customers. Harassing or discriminatory conduct is prohibited whether committed by managerial or non-managerial employees, temporary workers, contractors, consultants, vendors or customers. Prohibited conduct includes any conduct based on the above characteristics that unreasonably interferes with someone's work performance or creates an intimidating, hostile or offensive work environment. Conduct may be considered harassment or discrimination, whether it is:

- verbal – such as words, jokes, foul language, derogatory statements or slurs based on any protected characteristic, comments about someone's body, or unwanted sexual flirtations;
- physical – such as improper touching or assault; or
- visual – such as explicit or derogatory posters, cartoons, electronic images, drawings based on any protected characteristic or obscene gestures.

Offering or implying to offer employment benefits in exchange for sexual favors is prohibited. No supervisor or manager shall threaten or insinuate, either explicitly or implicitly, that an employee's submission to or rejection of sexual advances will in any way influence any personnel decision involving him/her. As EEOC guidelines state, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- submission to such conduct is made explicitly or implicitly a term or condition of employment;
- submission to or rejection of such conduct is used as the basis for employment decisions;
- such conduct unreasonably interferes with someone's work performance; or
- such conduct creates an intimidating, hostile or offensive work environment.

B. Pay Transparency Policy Statement

Veritiv 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 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 Veritiv's legal duty to furnish information.

C. Complaint Procedures

Every employee, regardless of his/her position, must comply with this policy, take appropriate measures to ensure that prohibited conduct does not occur and report any actions which do not comply with this policy as quickly as possible.

Any employee who believes that he/she has been the victim of or witness to harassment, discrimination or retaliation in violation of this policy, or who has received a complaint of such violation, must promptly report the conduct to management or Human Resources. Specifically, the employee must report the incident to one of the following:

- his/her supervisor or manager;
- his/her supervisor's or manager's manager;
- a Human Resources Business Partner or Director; or
- the HelpLine (1-888-312-2693 or <http://veritivhelpline.com>).

An employee is not required to first report the incident to his/her supervisor or manager; he/she may bypass the chain of command and choose from the list above. Complaints are not required to be in any particular form and may be oral or written. Employees should be prepared to work with management and Human Resources as necessary to identify and address the issue, including to:

- fully cooperate with any investigation that is required to resolve the issue and/or concern; and
- immediately report any signs of retaliation to one of the management or Human Resources individuals listed above.

All reports of discriminatory or harassing conduct will be investigated promptly, fairly, impartially, and thoroughly by qualified personnel. Complaints and the subsequent investigation

will be handled as confidentially as possible (consistent with conducting an appropriate investigation). Further, the results of the investigation will be timely addressed and dealt with appropriately. To the extent misconduct is found, appropriate remedial measures will be taken.

D. No Retaliation

Veritiv does not tolerate threats or acts of retaliation or retribution against employees who make good faith use of the complaint procedures or who provide information about such complaints. The complaint procedures above should be used to report any such actions.

While Veritiv not tolerate retaliation against any employee who files a complaint or brings forward any concerns in good faith, employees found to have filed a complaint or brought forth concerns not based in good faith will be subject to corrective action.

ENFORCEMENT

Failure to comply with this policy may result in appropriate disciplinary action, up to and including termination. Violations of this policy may also result in personal legal and financial liability.

APPLICABILITY

This policy supersedes all prior policies regarding this subject matter. This policy may be amended, revised and/or superseded at any time.