

Equal Employment Opportunity

Policy Statement

MedStar Health is an Equal Opportunity (EO) Employer and is committed to equal opportunity for all associates and candidates for employment. Where federal, state or local laws contain mandatory requirements that differ from the provisions of this section, such legal requirements prevail for associates working in affected locations.

Philosophy Statement

MedStar Health is committed to being an employer of choice by attracting, developing and retaining skilled and engaged associates through the use of best practice employment procedures.

Procedure

In furthering its commitment to provide equal opportunities, it is MedStar Health's policy to:

- Comply with both the letter and the spirit of all applicable laws and regulations governing employment.
- Provide equal employment opportunity to all associates and applicants for employment.
- Prohibit unlawful discrimination or harassment in any employment decision or in the administration of any Human Resources policy because of race, color, creed, religion, national origin, citizenship, sex, age, physical or mental disability, veteran status, marital status, personal appearance, family obligations, political affiliations, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local EO laws and regulations.
- Make reasonable accommodations for the physical and/or mental limitations of qualified associates or applicants with disabilities.
- Protect associates' right to refer possible violations of this policy to leadership, Human Resources, the Compliance Department or any government agency or court without intimidation, coercion, discrimination, harassment or retaliation of any form for exercising such rights.

I. Eligibility

This policy applies to all associates of MedStar Health, and where appropriate and required by law, to temporary associates, contract associates and independent contractors.

II. Scope of Equal Opportunity

MedStar Health's EO policy applies to all aspects of employment, specifically including, but not limited to:

- a. Recruiting
- b. Hiring
- c. Promotions
- d. Demotions
- e. Job transfers
- f. Reasonable job accommodations
- g. Working conditions
- h. Sponsored training programs
- i. Educational assistance
- j. Sponsored social and recreational programs or events
- k. Compensation
- l. Benefits
- m. Corrective actions
- n. Reductions in force
- o. Terminations of employment

III. Reporting Discrimination in the Workplace

All MedStar Health associates are responsible for helping to ensure that workplace discrimination is prevented. An associate who believes that he/she has witnessed discrimination, knows of discrimination or is being subjected to discrimination should immediately notify his/her leader, Human Resources, the Compliance Department or any other leader they believe can help them.

IV. Zero Tolerance and Non Retaliation

MedStar Health takes a "zero tolerance" approach to violations of its EO Policy. Therefore, any associate, whether supervisory or non-supervisory, who is determined to have violated this policy can be subjected to corrective action or

appropriate formal action, based on circumstances and severity, up to and including termination of employment. In addition, violations of federal, state or local EO laws and regulations addressed in this policy may lead to legal and/or financial liability.

In addition to a zero tolerance approach to discrimination in the workplace, MedStar Health takes the same approach with respect to acts of retaliation. Associates have a legal right to report and/or assist in investigations of possible violations of this policy. It is MedStar Health's policy that an associate who reports and/or assists in the investigation of a possible violation of this policy will not be subjected to retaliation, of any form, on or off workplace premises, by supervisory or non-supervisory personnel.

Retaliation that is prohibited by this policy includes, but is not limited to, the following conduct that occurs as a direct result of an associate's report of and/or assistance in the investigation of an EO policy violation:

- a. Explicit or implied threats, verbal or physical
- b. Inappropriate comments
- c. Acts of intimidation
- d. Negative change in working conditions
- e. Unwarranted corrective action
- f. Unwarranted exclusion from meetings, conferences or other work-related events

Associates who believe that they may be the subject of retaliation in violation of this policy should contact their immediate leader, Human Resources or the Compliance Department. Human Resources will be responsible for investigating such complaints. The Legal Department may be contacted for assistance in such situations.

V. Internal Investigations

In keeping with its commitment under this policy, MedStar Health will promptly and effectively investigate EO complaints of which it is made aware. These investigations will be conducted by the Human Resources and/or Legal Departments.

VI. Confidentiality

EO investigations are treated confidentially. Therefore, the investigator(s) and those participating in the investigation should take reasonable steps to maintain the confidentiality of the complaining party, the alleged transgressor, witnesses and other individuals who may assist or otherwise be involved in the investigation.

Important: Complete confidentiality cannot be guaranteed in such investigations. For example, it may be necessary to reveal the identity of the complaining party and/or witnesses in order for the alleged transgressor to be apprised of the allegations against him/her and to be afforded a fair opportunity to respond to the allegations. In such cases, the complaining party and the alleged transgressor should be reminded of the non-retaliation provisions of this policy.

VII. Responsibilities

a. Leaders

- Adhere to the letter and the spirit of MedStar Health's EO Policy, and of EO laws and regulations.
- Promote compliance with the terms of this policy and be alert to possible policy violations.
- Foster an environment that is free from discrimination, harassment and/or retaliation.
- Afford equal opportunity, as described in this policy, to all associates and job applicants in all aspects of employment including: recruiting, hiring, promotions, demotions, job transfers, reasonable job accommodations, working conditions, sponsored training programs, educational assistance, sponsored social and recreational programs or events, compensation, benefits, corrective actions, reductions in force, termination of employment.
- Rely on objective, job-related standards in the execution of all employment-related duties.
- Immediately report to Human Resources any known or perceived violations of this policy.
- Cooperate with any internal investigations that may arise from any known or perceived violations of this policy.

b. Associates

- Ensure that you understand this policy and its requirements, and contact leadership, Human Resources and/or the Compliance Department with any questions that you may have.
- Adhere to the letter and spirit of MedStar Health's EO policies, and of EO laws and regulations.
- Help foster an environment that is free from discrimination, harassment and/or retaliation.
- Inform leadership, Human Resources and/or the Compliance Department of situations where actual or potential violations of this policy exist.
- Cooperate with leadership, Human Resources, Compliance and other departments to ensure compliance with this policy.
- Cooperate with any internal investigations that may arise from known or perceived violations of this policy.
- Understand that MedStar Health takes false claims just as seriously as discrimination. Associates who knowingly make false claims of discrimination or retaliation may be subject to corrective action up to and including termination.

c. Human Resources

- Assist in educating leaders and associates regarding this policy, its requirements and their responsibilities.
- Ensure that MedStar Health's EO, Workplace Harassment Prevention, and Accommodations for Individuals with Special Needs policies are covered in new associate orientation programs.
- Ensure that federal and state government nondiscrimination posters are displayed permanently in conspicuous locations in all MedStar Health facilities.
- Where appropriate, inform and/or seek assistance from the Legal Department regarding complaints of known or perceived violations of this policy.
- Conduct and/or assist in internal investigations based on complaints regarding known or perceived violations of this policy.
- With the assistance of the Legal Department, serve as MedStar Health's representative where complaints are filed by associates, former associates or job applicants with federal and/or state non-discrimination agencies.

d. Compliance Department

- Assist in educating leaders and associates of the requirements of this policy through the Compliance Department's Code of Conduct.
- Upon receipt of a complaint regarding a perceived or actual violation of this policy, contact Human Resources so that an investigation of the complaint can take place.

Please contact your leader or Human Resources with any questions regarding this policy.

Provisions of this policy apply to all associates to the extent they do not conflict with relevant terms of an applicable contract.