

SAVOY MEDICAL CENTER
POLICIES AND PROCEDURES

Anit-Harrassment and Retaliation Policy	Human Resources Manual
Prepared by: Human Resources Director	Effective: 11/91
Approved by: Board of Directors	Revisions: 09/2018, 06/2023

PURPOSE

The purpose of this policy is to affirm Savoy Medical Center’s commitment to providing a workplace that is free of harassment and retaliation and to clearly outline the procedures under which Associates and other covered individuals may appropriately report harassment and retaliation in the workplace.

POLICY

Unlawful Harassment Prohibited

Savoy Medical Center strictly prohibits unlawful harassment on the basis of race, color, religion, creed, national origin, sex, gender, sexual orientation, age, disability, citizenship, service in the uniformed services, genetic information, or any other characteristic protected under applicable federal, state or local law.

This policy applies to any individual working at Savoy Medical Center or in a business relationship with Savoy Medical Center including: employed Associates, physicians, contractors, consultants, vendors, volunteers, and visitors “(Covered Person)”. This guideline is not intended to restrict communications or actions protected or required by state or federal law.

This policy applies to conduct at work, employer-sponsored events (including those off site), social events with coworkers, and social media. Associates are expected to be particularly careful about what they say and do in these circumstances.

All Types of Harassment

Savoy Medical Center's anti-harassment policy applies equally to unwelcome conduct based on the basis of race, color, religion, creed, national origin, sex, gender, age, physical or mental disability, citizenship, service in the uniformed services, genetic information, or any other characteristic protected under applicable federal, state or local law.

Savoy Medical Center will not allow such unwelcome conduct to (1) become a condition of continued employment or (2) become so severe or pervasive that it creates a work environment that is intimidating, hostile, or abusive. Such harassment includes conduct that is:

- Physical (e.g., assault or any inappropriate physical contact).
- Verbal (e.g., epithets, derogatory statements, slurs, insults, derogatory comments or jokes).
- Visual (e.g., sexting, emailing or displaying derogatory pictures, or making derogatory gestures).

This list is illustrative only, and not exhaustive. No form of harassment will be allowed.

Sexual Harassment

Savoy Medical Center strictly prohibits sexual harassment under the Equal Employment Opportunity Commission, Section 703 of Title VII of the Civil Rights Act of 1964. For purposes of this policy, “sexual harassment” is defined as:

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Unwelcome sexual advances, requests for sexual favors, and other verbal, physical or inappropriate conduct of a sexual nature if: (1) submission to such conduct is an explicit or implicit term or condition of an individual's employment; (2) submission to or rejection of such conduct is a basis for employment decisions affecting such individual; or (3) the conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment may include a range of behaviors and may involve individuals of the same or different gender. Sexual harassment of any employee by another employee, contract staff, or other person with whom an employee may have contact as part of his work environment is prohibited. Sexual harassment does not require the intent to offend. All employees should know of their responsibilities and protection under this policy.

Actions that are inappropriate and may meet the definition of sexual harassment or contribute to a hostile work environment, include but are not limited to the following:

- Sexual pranks, or repeated sexual teasing, jokes, gestures or innuendo;
- Lewd comments about an individual's body;
- Touching or grabbing of a sexual nature;
- Talking about ones' sexual activity in front of others; offensive remarks about an individual's sex or gender.
- Inappropriate unwelcome conduct of a sexual nature such as: cornering, repeatedly standing too close to or brushing up against another's body or leaning into or over a person;
- Giving gifts or leaving objects that are sexually suggestive;
- Posting, making, or displaying pornographic, sexually demeaning, or sexually explicit material in the workplace;
- Pressure for unnecessary personal interaction;
- Off-duty, unwelcome conduct of a sexual nature that affects the work environment;
- Making sexual statements in person, in writing, or electronically, such as email, instant messaging, text messaging, blogs, web pages, social media, etc.

Anyone can be a subject to sexual harassment, regardless of their sex and of the sex of the harasser. Savoy Medical Center recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

The Sexual Harassment Policy shall be posted on the Savoy Medical Center's website. Employees shall be informed if changes are made to the policy.

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Bullying

Savoy Medical Center prohibits abusive conduct, bullying or other intimidating or aggressive behavior among Associates or other Covered Persons, whether or not it is based on a characteristic protected by law. If an Associate is found to be mistreating his or her colleagues, Savoy Medical Center will take appropriate action to stop the behavior. If you would like to report behavior that you believe is bullying, you may use the same reporting procedures outlined below.

Reporting Procedure

Savoy Medical Center is committed to enforcing this guideline and taking prompt corrective action, and the effectiveness of our efforts depends largely on Associates promptly reporting inappropriate workplace conduct. Therefore, Savoy Medical Center encourages all Associates to promptly report all perceived incidents of harassment. Additionally, any manager or supervisor who observes potentially harassing conduct must report the conduct to Human Resources so that corrective action may be taken, if appropriate.

Savoy Medical Center encourages individuals who believe they are being subjected to conduct that violates this guideline to advise the offender that his or her behavior is unwelcome and request that it be stopped. Savoy Medical Center recognizes, however, that an individual may prefer to not address the offender and does not require an Associate to do so. If for any reason an individual does not wish to address the offender directly, or if such action does not successfully end the offensive conduct, the Associate should immediately report their concerns to their direct supervisor, the next level above their direct supervisor, or a member of Human Resources.

Individuals who believe they have witnessed conduct that violates this guideline should follow the same reporting structure. In addition, Associates may call the CHRISTUS Integrity Line at 1-888-728-8383. A complaint should be as detailed as possible, including the names of all individuals involved and any witnesses.

If the Associate has not received a satisfactory response within five (5) days after reporting any incident of what you perceive to be harassment, please immediately contact the Human Resources Department, which will ensure that a prompt investigation is conducted.. Any complaint and information resulting from the harassment investigation will be kept in the strictest confidence, only informing those persons, as the situation dictates, who need to know to affect the earliest resolution.

Associates will not be subject to disciplinary action for reporting in good faith any concerns about discrimination, even if the complaint cannot be verified. The making of an intentionally false or malicious report, however, is a serious matter and may result in disciplinary action.

Supervisors who receive a complaint regarding conduct prohibited by this policy, or who learn of information that suggests this policy may have been violated, are required to promptly (ideally within 24 hours) forward that complaint to Human Resources. Supervisors who fail to do so may be subject to discipline for failure to timely report.

Savoy Medical Center will promptly investigate the facts and circumstances of all claims of perceived discrimination and will take prompt corrective action, if appropriate. The investigation may include individual interviews with the parties involved and with individuals who may have observed the alleged conduct or may have other relevant knowledge. Associates are expected to cooperate and provide truthful information in an investigation.

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Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action. Nothing in this policy is to be construed as a guarantee of absolute confidentiality or intended to curtail Associates' rights under the law to discuss work-related matters. Disclosure of information learned through the complaint process and the investigation will be limited to disclosures that are necessary for Savoy Medical Center to fulfill its legal obligations to investigate and take prompt action to end harassment.

To protect confidentiality and to ensure fairness to everyone involved, we may not be able to answer specific questions about an investigation, but Human Resources will reach out to you to inform you that the matter has been addressed and closed.

The Employment Assistance Program (EAP) is available for Associates at any time. An Associate who reports harassment or who is subject of a complaint is encouraged to take advantage of EAP, as needed, throughout the complaint procedure.

No Retaliation

Savoy Medical Center strictly prohibits retaliation against any individual who makes a good faith report of discrimination or harassment, pursues any discrimination or harassment claim, or participates in any related investigation.

Retaliation is any action, statement or behavior that is designed to punish an employee for filing a complaint, cooperating with an investigation of a complaint, seeking guidance regarding a compliance concern or to deter an employee from taking such action. Perceived acts of retaliation should be reported immediately to the Associate's supervisor, second-level supervisor, or a member of Human Resources, or through the CHRISTUS Integrity Line at 1-888-728-8383.

No one will be subject to any form of discipline, reprisal, intimidation or retaliation for good faith reporting of incidents of harassment of any kind, pursuing any harassment claim or cooperating in related investigations.

Violations of This Guideline

Any Associate, regardless of position or title, whom Savoy Medical Center determines has subjected an individual to discrimination or retaliation in violation of this guideline will be subject to discipline, up to and including termination of employment.

Training and Education

Savoy Medical Center will require all associates to complete annual training through the Christus Healthstream platform. Regardless of the associate's job title, all associates will be required to complete coursework on subjects of anti-harassment and retaliation. Failure to complete the training requirements may result in disciplinary action.

Annual Reporting.

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The Human Resource Office will compile and submit an annual report to Administration on February 15th of each year containing information from the previous calendar year. The report shall include:

- ♣ The number and percentage of employees who have completed the mandatory training requirements;
 - ♣ The number of sexual harassment complaints received;
 - ♣ The number of complaints which resulted in a finding that sexual harassment occurred;
 - ♣ The number of complaints in which the finding of sexual harassment resulted in discipline or corrective action;
- and
- ♣ The amount of time it took to resolve each complaint.

These reports shall be public record and available to the public in accordance with the Public Records Law