



January 1, 2017

## **EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION PROGRAM POLICY STATEMENT**

Health Care Service Corporation (hereinafter referred to as HCSC or the company), a Mutual Legal Reserve Company, has implemented the following policies and procedures as part of its longstanding commitment to compliance with all applicable equal opportunity and affirmative action requirements.

HCSC is committed to maintaining a work environment that is free from any and all forms of unlawful discrimination and harassment. It is therefore the company's policy to prohibit discrimination and harassment against any applicant, employee, vendor, contractor, customer, or client on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, pregnancy, veteran status, genetic information, citizenship status, or any other basis prohibited by law. It is also the company's policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct, or participated in a company or agency investigation into such complaints.

HCSC is also a federal contractor subject to Executive Order 11246, as amended, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (Section 4212), and Section 503 of the Rehabilitation Act of 1973, as amended (Section 503). As such, HCSC is committed to taking positive steps to implement the employment-related aspects of the company's equal opportunity policy. Accordingly, it is HCSC's policy to take affirmative action to employ, advance in employment, and otherwise treat qualified minorities, women, protected veterans, and individuals with disabilities without regard to their race/ethnicity, sex/sexual orientation/gender identity, veteran status, or physical or mental disability. Under this policy, HCSC will also provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose undue hardship on the operation of the company's business.

The company's affirmative action policy also prohibits employees and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans; (3) opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans; or (4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

The non-confidential portions of the affirmative action program for individuals with disabilities and protected veterans shall be available for inspection upon request by any employee or applicant for employment in the Human Resources Department, Monday through Friday, 9:00 a.m. to 5:00 p.m.

These policies apply whenever and wherever a company employee is performing a function of his or her job, including all HCSC locations, client worksites, and company-sponsored or client-sponsored business and social functions. The company's equal opportunity and affirmative action policies require that employment decisions be based only on valid job requirements, and extend to all terms, conditions, and privileges of employment including, but not limited to, recruitment, selection, compensation, benefits, training, promotion, and disciplinary actions.

A key component of the company's commitment to equal opportunity is zero tolerance for workplace harassment based on, or because of, an individual's race, color, religion, creed, sex, sexual orientation, gender identity, national origin, age, disability, pregnancy, veteran status, citizenship status, or any other reason prohibited by law. Such harassment, whether committed by company personnel or by clients, customers, vendors, or other individuals doing business with HCSC, will not be tolerated. Prohibited harassment occurs when a supervisor, co-worker, or even a non-employee behaves or acts in such a way that creates a hostile work environment for another employee based on an individual's race, color, religion, creed, sex, sexual orientation, gender identity, national origin, age, disability, pregnancy, veteran status, citizenship status, or other protected characteristic.



HCSC management is responsible for ensuring compliance with all aspects of this equal employment opportunity policy and for developing implementation strategies that promote its intent. HCSC personnel have an obligation to contribute to a harassment- and discrimination-free workplace. Any employee who suffers or observes harassment or any other violation of this policy is strongly encouraged to notify one of the individuals identified below. HCSC will promptly and thoroughly investigate the alleged misconduct and, if a violation of this policy is found, will take immediate and appropriate corrective action. Every employee is encouraged to come forward without fear of reprisal, as HCSC's equal opportunity and affirmative action policies prohibit any and all forms of retaliation against anyone who in good faith complains that these policies are not being followed, or who otherwise participates in a company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been subjected to retaliation, your complaint should be directed to one of the individuals identified below.

After receiving a complaint involving a violation of the company's equal opportunity or affirmative action policy, the company will investigate and take corrective action, as appropriate. Complaints and investigations will be kept strictly confidential to the maximum extent possible. No one, regardless of position or length of service, is exempt from these policies.

Employees or applicants will not be discharged or in any other manner discriminated against 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 a 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 the contractor's legal duty to furnish information.

As President and CEO, I fully support our affirmative action program and am committed to the implementation of the company's equal opportunity and affirmative action policies. I have delegated overall responsibility for these policies to Nazneen Razi, Senior Vice President – Chief Human Resources Officer and EEO Executive Officer. Joyce-Marie Garay, Esq., EEO Coordinator, manages the implementation and auditing of HCSC's Affirmative Action Program (AAP) for individuals with disabilities and protected veterans. The AAP includes an audit and reporting system, which, among other things, measures the effectiveness of the AAP. All managers and supervisors will take an active part in HCSC's AAP to ensure that all qualified employees with disabilities and protected veterans and prospective employees are considered and treated in a non-discriminatory manner with respect to all employment decisions. Furthermore, HCSC will solicit the cooperation and support of all employees for HCSC's policy and AAP. The EEO Coordinator has been assigned responsibility for periodically reviewing progress in the compliance and implementation of the policy of affirmative action for individuals with disabilities and protected veterans.

Any applicant or employee wishing to address an issue covered by this statement or related policy, or who would like to view HCSC's Affirmative Action Plan (AAP) may contact a representative at the number listed at the end of this statement.

Employees who wish to voluntarily identify or update their self-identification as an individual with a disability or a protected veteran may access their Self-Identification Summary directly on Employee Data Direct (EDD) and make their selection. Any questions may be directed to Employee Services at the number below.

Representative Number: Employee Services 866-977-7378

Paula Steiner, President, Chief Executive Officer and EEO Executive Officer

Nazneen Razi, Senior Vice President, Chief Human Resources Officer and EEO Executive Officer

Joyce-Marie Garay, Sr. Human Resources Regulatory Compliance Consultant and EEO Coordinator