



Trinity Health Human Resources Ministry-Wide Policy No. 1006

EFFECTIVE DATE: March 31, 2022

POLICY TITLE:

Equal Employment Opportunity

*To be reviewed every three years by:
Executive Leadership Team*

REVIEW BY: April 1, 2025

PURPOSE

The purpose of this Policy is for Trinity Health Corporation and its Health Ministries and Subsidiaries (collectively referred to as “Trinity Health”) to reaffirm Trinity Health’s commitment to non-discrimination in employment and to support the intent, as well as the written word, of applicable federal, state, and local laws, and regulations. All conditions of employment, employment decisions and policies will be administered solely based on an individual’s ability and qualifications without regard to any protected category as defined in applicable federal, state, and local laws, and regulations.

Trinity Health is committed to administering this Policy in accordance with its Mission, Core Values and commitment to Diversity, Equity and Inclusion.

POLICY

It is the policy of Trinity Health to provide equal employment opportunities in all aspects of Employer/Employee relations according to federal, state and local laws, ordinances and executive orders. Trinity Health will not discriminate against Employee or applicants based on any legally-recognized basis, including, but not limited to: race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), gender identity, sexual orientation, age, national origin or ancestry, citizenship status, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status or any other status protected by federal, state or local law.

Reasonable Accommodation for Disabilities and Religious Beliefs, Observances and Practices

Trinity Health will provide, in accordance with applicable federal and state laws, a reasonable accommodation for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an Employee, unless undue hardship and/or a direct threat to the health and/or safety of the individual or others would result. A reasonable accommodation

is a change in work environment that enables a qualified person with a disability to perform the essential functions of the job and which does not cause an undue hardship to the Employer or involve significant risk to the health or safety of the individual with a disability or others. Some examples of reasonable accommodations can include provisions of an auxiliary aid, device or equipment, alternative testing methods, modification of the work environment or manner in which the job duties are performed and/or transfer to a modified work schedule.

The Employer will provide reasonable accommodation for an Employee's religious beliefs, observances, and practices when a need for such accommodation is identified, and a reasonable accommodation is available. A reasonable accommodation is one that eliminates the conflict between an Employee's religious beliefs, observances, or practices and the Employee's job requirements, without causing undue hardship to the Employer.

Trinity Health will not retaliate against any Employee for obtaining an accommodation or requesting an accommodation under the provisions of this Policy. Anyone who retaliates against an Employee in violation of this Policy will be subject to discipline, up to and including termination, at the sole discretion of Trinity Health.

PROCEDURES

A. Employees

1. Trinity Health mandates non-discrimination in all Human Resources policies, practices and terms and conditions of employment for its Employees.
2. This Policy shall be communicated to all Employees. This Policy statement will be emphasized during new Employee orientation and on bulletin board postings.
3. All leaders, managers and supervisors are to ensure that all work activities within their areas of responsibility are conducted in a manner that complies with this Policy.
4. Federal and state government anti-discrimination posters and Trinity Health's Equal Employment Opportunity Statement will be displayed in all facilities in conspicuous locations where notices to Employees and applicants for employment are customarily placed.
5. Trinity Health will have an annual Equal Employment Opportunity Report (EEO-1) completed as required.

B. Recruitment

1. All job postings will be administered in a non-discriminatory manner. Recruitment sources used to refer to applicants must be informed orally and/or in writing of Trinity Health's commitment to equal employment opportunity.

2. Employment notices, advertisements, specifications, and forms will not indicate any preferences, limitations or discrimination based on any protected status under applicable local, state, or federal law(s).
3. All Trinity Health employment recruitment advertisements must include the phrase “an equal opportunity employer” or “EOE.”
4. All pre-employment and/or interview questions, written or oral, must be designed not to elicit any information which would deprive the applicant of equal employment opportunity.
5. Qualified recruiting sources should be used whenever possible to encourage applicant flow of qualified women, minorities, and disabled individuals.
6. Reasonable accommodations shall be provided for applicants, in accordance with applicable federal, state and/or local laws, during the hiring process.

C. Complaints

1. Any Employee who believes they have been subjected to discrimination or harassment is strongly encouraged to report the alleged discriminatory act to Human Resources, a supervisor, a higher-level manager, the Department of Diversity and Inclusion, an individual Health Ministry’s Integrity and Compliance Officer, or by contacting the Integrity and Compliance Line, 866-477-4661 or www.mycompliancereport.com, as soon as possible after the incident. All leaders, managers, and/or supervisors shall report all suspected incidents of discrimination or harassment.
2. All complaints of discrimination or harassment will be investigated promptly, thoroughly, and impartially. It is the responsibility of every Employee, and manager, to bring to Trinity Health’s attention any evidence or allegation of discrimination or harassment so that the matter can be promptly investigated, and appropriate corrective action taken.
3. Managers who directly receive a formal charge of discrimination filed with federal, state, or local civil rights agencies, or the federal or state Department of Labor, must immediately notify the Chief Human Resources Officer (CHRO) or Regional Director of Colleague/Labor Relations (or designee).
4. Trinity Health will take appropriate action to ensure that the rights of individuals to file complaints, furnish information, or participate in an investigation, hearing or other activity related to enforcing anti-discrimination laws will be respected and not interfered with in any manner.
5. Trinity Health prohibits any form of retaliation against any Employee for reporting discrimination under this Policy or for testifying, assisting, or participating in any manner in any investigation, proceeding or hearing whether conducted by Trinity Health or by another governmental enforcement agency. An Employee should follow the reporting procedures described herein to report retaliation.

Prohibited retaliation includes, but is not limited to: termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions, responding to an Employee engaged in protected activity by taking adverse action against their family member who is also a Trinity Health Employee, or otherwise denying any employment benefit.

6. Any Employee who engages in illegal discrimination, harassment, or retaliation in violation of this Policy will be subject to discipline up to and including termination, at the sole discretion of Trinity Health.
7. All requests for accommodations will be evaluated on a case-by-case basis. Trinity Health will participate in an interactive process with the applicant or Employee to determine if a reasonable accommodation is appropriate. Human Resources may also collaborate with other local services, internal and external, that specialize in providing resources for persons with disabilities.

D. RESPONSIBILITY

Any questions or concerns regarding this Policy should be directed to the Colleague and Labor Relations Centers of Expertise.

SCOPE/APPLICABILITY

This Policy is intended to be a system-wide policy that applies to all Employees of Trinity Health, its Health Ministries and Subsidiaries, subject to any modifications necessary to comply with applicable state and local laws and regulations, collective bargaining agreements, written employment agreements, accreditation requirements or otherwise and that are approved by the Trinity Health EVP, Chief Human Resources Officer or an appropriate designee, in consultation with the Trinity Health Legal Department as necessary. For purposes of this Policy, the Trinity Health SVP, System Office Chief Human Resources Officer is an authorized designee to approve such modifications.

DEFINITIONS

Employee means an employee of Trinity Health or one of its Health Ministries or Subsidiaries, whether that individual's status is permanent or temporary, contingent, part- or full-time. Trinity Health often uses the term "colleague" to refer to its Employees. In HR policies, "Employee" is used instead of "colleague" to be clear that HR policies apply to individuals in an employment relationship with Trinity Health or one of its Health Ministries or Subsidiaries. The form of the Policy does not change an Employee's Primary Employer, defined as the payroll company of record, and does not create a joint employment relationship with any entity.

Health Ministry (sometimes referred to as Ministry) means a first tier (direct) subsidiary, affiliate, or operating division of Trinity Health that maintains a governing body that has day-to-day management oversight of a designated portion of Trinity Health System operations. A Health Ministry may be based on a geographic market or dedication to a service line or business. Health

Ministries include Mission Health Ministries, National Health Ministries, and Regional Health Ministries.

Policy means a statement of high-level direction on matters of importance to Trinity Health, its Health Ministries and Subsidiaries or a statement that further interprets Trinity Health's, its Health Ministries' and Subsidiaries' governing documents. Policies may be either stand alone, Systemwide or Mirror Policies designated by the approving body.

Primary Employer means the entity for which the Employee provides more than 50% of services and is the payroll company of record.

Procedure means a document designed to implement a Policy or a description of specific required actions or processes.

Reasonable Accommodation is any change to a job, the work environment, or the way things are usually done that allows an individual with a disability to apply for a job, perform job functions, or enjoy equal access to benefits available to other individuals in the workplace.

Retaliation means taking an adverse action against an Employee that has engaged in protected activity of reporting, complaining or participating in an investigation.

Standards or Guidelines mean additional guidance which assists an Employee in understanding the employer's rule, policies and/or procedures, including those developed by accreditation or professional organizations.

Subsidiary means a legal entity in which a Trinity Health Ministry is the sole corporate member or sole shareholder.

RESPONSIBLE DEPARTMENT

Further guidance concerning this Policy may be obtained from the Colleague and Labor Relations Center of Expertise.

APPROVALS

Initial Approval: August 18, 2021