

COMMONSPIRIT HEALTH ADMINISTRATIVE POLICY

SUBJECT: Harassment-Free Workplace

POLICY NUMBER: Human Resources
A-014

EFFECTIVE DATE: October 14, 2020

**ORIGINAL EFFECTIVE
DATE:** October 14, 2020

National/System Offices

Acute Care Facilities

Non-Acute Care Facilities

PURPOSE

CommonSpirit Health is committed to providing a safe, supportive work environment free from harassment or discrimination.

POLICY

CommonSpirit prohibits harassment and discrimination on the basis of race, color, ethnicity, religion, age, sex, national origin, sexual orientation, gender identity, pregnancy, genetic information, veteran and military status, disability, citizenship, or any other basis protected by applicable federal, state or, local law.

APPLICABILITY

This Policy applies to CommonSpirit and its Direct Affiliates¹ employees, as well as employees of its Subsidiaries² who are considered CommonSpirit employees. This Policy, likewise, applies to all individuals who interact with any CommonSpirit employees, including but not limited to: non-employee physicians, volunteers, contractors, students, visitors, patients, or vendors.

GUIDELINES

By way of example, harassment includes, but is not limited to:

- Verbal or physical conduct that denigrates another individual;
- Ethnic slurs, epithets, or racial jokes;
- Threatening, intimidating, bullying, or hostile acts;
- Displaying, storing, or transmitting graphic, offensive, or harassing materials at work or while using employer equipment or facilities; or
- Unwanted or unwelcome physical contact.

¹ A Direct Affiliate is any corporation of which CommonSpirit Health is the sole corporate member or sole shareholder, as well as Dignity Community Care, a Colorado nonprofit corporation.

² A Subsidiary refers to *either* an organization, whether nonprofit or for-profit, in which a Direct Affiliate holds the power to appoint fifty percent (50%) or more of the voting members of the governing body of such organization or holds fifty percent (50%) or more of the voting rights in such organization (as evidenced by membership powers or securities conferring certain decision-making authority on the Direct Affiliate) or any organization in which a Subsidiary holds such power or voting rights.

Sexual harassment includes any unwanted physical or verbal conduct that directly or indirectly affects a term or condition of employment, or creates an intimidating, hostile, or offensive work environment. This unwelcome conduct can include, but is not limited to:

- Sexual advances and requests;
- Physical assault, leers, stares, gestures, or other sexually suggestive conduct;
- Sexually suggestive comments, slurs, innuendos, jokes, or insults
- Sexually suggestive objects, pictures, language, or other materials;
- Conduct or comments targeted at one gender, even if the content is not sexual; or
- Any sexually suggestive, deliberate verbal or physical conduct that creates an intimidating, hostile, or offensive work environment.

Employees who believe they have been subjected to sexual harassment or who witness sexual harassment are expected to immediately report such conduct to any manager or Human Resources in accordance with this Policy. Such reports can also be made confidentially using any of the following methods:

- Email
- Employer hotline(s)
- Written reports

All complaints raised will be timely and impartially investigated by Human Resources. All parties will be afforded due process and conclusions reached based on the evidence gathered. All matters will be kept confidential, to the extent possible. All employees are expected to cooperate in the investigation process.

Any identified misconduct including a violation of this Policy will result in corrective action or other remedial measures, up to and including termination of employment. Employee violations of this Policy also can constitute violations of other relevant policies.

No person will be retaliated against for reporting a concern in good faith, raising a complaint under this Policy, or for participating in an investigation. An employee who believes he/she has been subjected to retaliation should promptly report the conduct to his/her manager, another manager, or Human Resources.

ASSOCIATED DOCUMENTS

CommonSpirit Administrative Addendum

Human Resources A-014A, *Harassment Free Workplace California Addendum*