

EQUAL OPPORTUNITY AND NON-DISCRIMINATION POLICY



MEDICAMPUS is committed to a policy of equal employment and equal access in its educational programs and activities. Diversity, inclusion, and an environment free from discrimination are central to the mission of the Institute.

It is the policy of the Institute to recruit, employ, retain, promote, and provide benefits to employees (including paid and unpaid interns) and to admit and provide services for students without regard to race, color, creed, national origin, ethnicity, ancestry, religion, age, sex (including pregnancy, childbirth and related conditions), sexual orientation, gender, gender identity, marital status, partnership status, disability, genetic information, alienage, citizenship, status as a victim of domestic violence/stalking/sex offenses, unemployment status, or any other legally prohibited basis in accordance with state laws.

This Policy also prohibits retaliation for reporting or opposing discrimination or cooperating with an investigation of a discrimination complaint.

Prohibited conduct defined

- **Discrimination** is treating an individual differently or less favorably because of his or her protected characteristics—such as race, color, religion, sex, gender, national origin, or any of the other bases prohibited by this Policy.
- **Harassment** is a form of discrimination that consists of unwelcome conduct based on a protected characteristic that has the purpose or effect of unreasonably interfering with an individual's work or academic performance or creating an intimidating, hostile or abusive work or academic environment. Such conduct can be spoken, written, visual, and/or physical.
- **Retaliation** is adverse treatment of an individual because he or she made a discrimination complaint, opposed discrimination, or cooperated with an investigation of a discrimination complaint.

Discrimination, harassment, and retaliation complaints

MEDICAMPUS is committed to addressing discrimination, harassment, and retaliation complaints promptly, consistently, and fairly. There shall be a Chief Diversity Officer, who shall be responsible for, among other things, addressing discrimination, harassment, and retaliation complaints under this Policy.

The Chief Diversity Officer may be a member of the Student Office or another Faculty member. The Chief Diversity Officer will be appointed by the Managing Director.

Academic freedom

This policy shall not be interpreted so as to constitute interference with academic freedom.

Responsibility for compliance

The Managing Director has ultimate responsibility for overseeing compliance with this policy. In addition, each person with managerial responsibility must promptly consult with the Chief Diversity Officer if he or she becomes aware of conduct or allegations of conduct that may violate this policy. All members of the Institute community are required to cooperate in any investigation of a discrimination, harassment, or retaliation complaint.

COMPLAINT PROCEDURES UNDER THE MEDICAMPUS EQUAL OPPORTUNITY AND NON-DISCRIMINATION POLICY

1. Reporting discrimination, harassment and/or retaliation

The Institute is committed to addressing discrimination, harassment and/or retaliation complaints promptly, consistently, and fairly.

Members of the Institute community, as well as visitors, may promptly report any allegations of discrimination, harassment or retaliation to the individuals set forth below:

- a. Applicants, employees, visitors, and students with discrimination and/or retaliation complaints should raise their concerns with the Chief Diversity Officer.
- b. Applicants, employees, visitors, and students with complaints of sexual harassment or sexual violence, including sexual assault, stalking, domestic and intimate violence, should raise their concerns with the Chief Diversity Officer.

2. Preliminary review of employee, student, or visitor concerns

Individuals who believe they have experienced discrimination, harassment and/or retaliation should promptly contact the Chief Diversity Officer to discuss their concerns, with or without filing a complaint. Following the discussion, the Chief Diversity Officer will inform the complainant of the options available. These include seeking informal resolution of the issues the complainant has encountered or the Institute conducting a full investigation.

3. Filing a Complaint

Following the discussion with the Chief Diversity Officer, individuals who wish to pursue a complaint of discrimination, harassment and/or retaliation should report such complaint in writing to the Chief Diversity Officer. Complaints should be made in writing whenever possible, including in cases where the complainant is seeking an informal resolution.

4. Informal Resolution

Individuals who believe they have been discriminated, harassed, or retaliated against may choose to resolve their complaints informally. Informal resolution is a process whereby parties can participate in a search for fair and workable solutions. The parties may agree upon a variety of resolutions, including but not limited to modification of work assignment, training for a department, or an apology.

The Chief Diversity Officer will determine if informal resolution is appropriate in light of the nature of the complaint. Informal resolution requires the consent of both the complainant and the respondent and suspends the complaint process for up to thirty (30) calendar days, which can be extended upon consent of both parties, at the discretion of the Chief Diversity Officer.

Resolutions should be agreed upon, signed by, and provided to both parties. Once both parties reach an informal agreement, it is final. Because informal resolution is voluntary, sanctions may be imposed against the parties only for a breach of the executed voluntary agreement.

The Chief Diversity Officer or either party may at any time, prior to the expiration of thirty (30) calendar days, declare that attempts at informal resolution have failed. Upon such notice, the Chief Diversity Officer may commence a full investigation. If no informal resolution of a complaint is reached, the complainant may request that the Chief Diversity Officer conduct a full investigation of the complaint.

5. Investigation

A full investigation of a complaint may commence when it is warranted after a review of the complaint, or after informal resolution has failed.

It is recommended that the intake and investigation include the following, to the extent feasible:

- a. Interviewing the complainant. In addition to obtaining information from the complainant (including the names of any possible witnesses), the complainant should be informed that an investigation is being commenced, that interviews of the respondent and possibly other people will be conducted, and that the Managing Director will determine what action, if any, to take after the investigation is completed.
- b. Interviewing the respondent. In addition to obtaining information from the respondent (including the names of any possible witnesses), the respondent should be informed that a complaint of discrimination, harassment and/or retaliation has been received and should be provided with a written summary of the complaint unless circumstances warrant otherwise. Additionally, the respondent should be informed that an investigation has begun, which may include interviews with third parties, and that the Managing Director will determine what action, if any, to take after the investigation is completed. A respondent employee who is covered by a collective bargaining agreement may consult with, and have, a union representative present during the interview. The respondent must be informed that retaliation against any person who files a complaint of discrimination and/or harassment, participates in an investigation, or opposes a discriminatory employment or educational practice or policy is prohibited under this policy. The respondent should be informed that if retaliatory behavior is engaged in by either the respondent or anyone acting on his/her behalf, the respondent may be subject to disciplinary charges, which, if sustained, may result in penalties up to and including termination of employment, or permanent dismissal from the Institute if the respondent is a student.
- c. Reviewing other evidence. The Chief Diversity Officer should determine if, in addition to the complainant, the respondent, and those persons named by them, there are others who may have relevant information regarding the events in question and speak with them. The Chief Diversity Officer should also review documentary evidence that may be relevant to the complaint.

6. Withdrawing a complaint

A complaint of discrimination may be withdrawn at any time during the informal resolution or investigation process. Only the complainant may withdraw a complaint. Requests for withdrawals must be submitted in writing to the Chief Diversity Officer. The Institute reserves the right to continue with an investigation if it is warranted. In a case where the Institute decides to continue with an investigation, it will inform the complainant.

In either event, the respondent must be notified in writing that the complainant has withdrawn the complaint and whether Institute officials have determined that continuation of the investigation is warranted for corrective purposes.

7. Timeframe

While some complaints may require extensive investigation, whenever possible, the investigation of a complaint should be completed within sixty (60) calendar days of the receipt of the complaint.

8. Action following investigation of a complaint

- a. Promptly following the completion of the investigation, the Chief Diversity Officer will report his or her findings to the Managing Director.
- b. Following such report, the Managing Director will review the complaint investigation report and, when warranted by the facts, authorize such action as he/she deems necessary to properly correct the effects of or to prevent further harm to an affected party or others similarly situated. This can include commencing action to discipline the respondent under collective bargaining agreements.
- c. The complainant and the respondent should be apprised in writing of the outcome and action, if any, taken as a result of the complaint.
- d. The Managing Director will sign a form that will go into each investigation file, stating what, if any, action will be taken pursuant to the investigation.

- e. If the Managing Director is the respondent, the Dean will appoint an investigator who will report his/her findings to the Dean. The Dean will determine what action will be taken. The Dean's decision will be final.

9. Immediate preventive action

The Managing Director may take whatever action is appropriate to protect the Institute community in accordance with collective bargaining agreements.

10. False and malicious accusations

Members of the Institute community who make false and malicious complaints of discrimination, as opposed to complaints which, even if erroneous, are made in good faith, will be subject to disciplinary action.

11. Responsibilities

a. Responsibilities of the Managing Director:

- Appoint a Chief Diversity Officer responsible for addressing complaints under this Policy.
- Ensure that the Chief Diversity Officer is fully trained and equipped to carry out his/her responsibilities.
- Ensure that managers receive training on the Policy.
- Annually disseminate via email the Policy and these Procedures to the entire Institute community and include the names, titles and contact information of all appropriate resources at the Institute.

b. Responsibilities of Managers:

Managers must take steps to create a workplace free of discrimination, harassment, and retaliation, and must take each and every complaint seriously. Managers must promptly consult with the Chief Diversity Officer if they become aware of conduct that may violate the Policy.

For purposes of this policy, managers are employees who either (a) have the authority to make tangible employment decisions with regard to other employees, including the authority to hire, fire, promote, compensate or

assign significantly different responsibilities; or (b) have the authority to make recommendations on tangible employment decisions that are given particular weight. Managers include Dean, directors, or other persons with managerial responsibility.

c. Responsibilities of the Institute community-at-large:

- Members of the Institute community who become aware of allegations of discrimination, harassment or retaliation should encourage the aggrieved individual to report the alleged behavior.
- All employees and students are required to cooperate in any investigation.