



MERITUS SCHOOL OF OSTEOPATHIC MEDICINE

Non-Discrimination Policy

Policy Number: COM-1.5.1

Effective Date: January 17, 2023

Approved by: Paula Gregory, DO, Dean

It is the firm policy of Meritus School of Osteopathic Medicine not to discriminate on the basis of basis of race, ethnicity, color, sex, sexual orientation, gender, gender identity, religion, national origin, age or disabilities.

Policy & Procedure Statement

Meritus School of Osteopathic Medicine strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Employees should be able to work and learn in a safe and stimulating atmosphere. The accomplishment of this goal is essential to the mission of the company. For that reason, the SOM will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, the company will seek to prevent, correct and discipline behavior that violates this policy. All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension or termination of employment.

Prohibited Conduct Under This Policy

The SOM, in compliance with all applicable federal, state and local anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:

Discrimination It is a violation of SOM policy to discriminate in the selection of administrative personnel, faculty and staff, and students, the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, on the basis of race, ethnicity, color, sex, sexual orientation, gender, gender identity, religion, national origin, age or disabilities. Further, it is a violation of SOM Policy to discriminate in the selection of administrative personnel, faculty and staff, and students if the basis of that discriminatory treatment is, in whole or in part, genetic information or marital status in its programs, activities, hiring, or the admission of students. Discrimination of this kind may also be strictly prohibited by a

variety of federal, state and local laws, including but not limited to, Title VII of the Civil Rights Act 1964, Title IX of the Educational Amendments of 1972, the Age Discrimination Act of 1975, and the Americans with Disabilities Act of 1990 as Amended, 2008. This policy is intended to comply with the prohibitions stated in these anti-discrimination laws. Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

Title IX Regulations

All members of the SOM community should be aware that Meritus Health and MSOM are concerned about discrimination, harassment, and retaliation and are prepared to take action to prevent and correct such behavior. Individuals who engage in such behavior are subject to discipline, up to and including termination or dismissal/expulsion. The SOM considers discrimination, harassment in all its forms, and retaliation to be a serious offense. These types of conduct create exposure and liability for the Meritus School of Osteopathic Medicine and the individual. Retaliation against a person who reports, complains about, or participates in the investigation of discrimination and/or harassment is also prohibited. Retaliation occurs when an adverse action is taken on an employee or on a student because the employee or the student participated in a protected activity. A hostile or offensive environment for another person can be created by sending emails that have content that is based on race, sex, gender identity, national origin, disability, sexual orientation, or any other legally protected characteristic. Further, images on a computer monitor that contain matter that can be offensive to others could give rise to complaints of harassment. Information concerning an allegation of discrimination, harassment and/or retaliation will be handled in a confidential manner insofar as possible. Any employee or agent of the SOM who receives a complaint of discrimination, harassment and/or retaliation or who otherwise learns of the occurrence of harassment has the responsibility to take prompt steps to ensure that the matter is addressed, even if the complainant refuses to be identified.

SOM supervisory personnel have a responsibility and are required to discourage and eliminate conduct inconsistent with this policy. Supervisors are required to report any occurrence of discrimination, harassment, and retaliation they are aware of. Depending on the circumstances, the person against whom the complaint has been made may be placed on administrative leave pending investigation. Other interim measures may also be implemented to minimize any potential negative impact on the parties and/or to maintain the integrity of the investigation. Appropriate remedial action will be taken depending upon the outcome of the investigation. No employee or student will be retaliated against for making a complaint, for bringing inappropriate conduct to the attention of management, or for participating in any investigation or hearing. Persons who are not employees of the SOM, but who perform work at the SOM for its benefit (such as contractors and their employees, temporary employees provided by agencies, visitors employed in joint projects, etc.) must comply with this policy. Complaints against such individuals will be investigated and addressed.