

<p align="center">CITY OF URBANA HUMAN RELATIONS DIVISION 400 SOUTH VINE ST. URBANA, ILLINOIS 61801 (217) 384-2455 (phone); 328-8288 (fax) hro@urbanainllinois.us</p>	Office Use Only (09/15)	
	Requested by:	Date:
	Approved by:	Date:
	Certification Date:	
		Certificate Expiration Date:

EQUAL EMPLOYMENT OPPORTUNITY (E.E.O.) WORKFORCE STATISTICS FORM

Please complete the sections below as instructed. Failure to properly complete this form may result in a delay or denial of eligibility to bid or do business with the City of Urbana.

Section I. Identification

1. Company Name and Address:

Name: Health Alliance Medical Plans, Inc.

d/b/a:

Address: 301 S. Vine Street

City/State/Zip: Urbana, IL 61801

Telephone Number(s) include area code: 217-326-0397 (Lauren Schmid, VP HR)

Check one of the following

Corporation	<input checked="" type="checkbox"/>	Partnership	<input type="checkbox"/>	Individual Proprietorship	<input type="checkbox"/>	Limited Liability Corp.	<input type="checkbox"/>
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FEI Number: 37-1260731

Social Security Number: N/A

2. Name and Address of the Company's Principal Office (answer only if not the same as above)

Name: Carle (parent company)

Address: 611 W. Park Street

City/State/Zip Urbana, IL 61801

3. Major activity of your company (product or service): Health Insurance

4. Project on which your company is bidding:

5. City of Urbana contact staff assigned to contract:

SECTION II. Policies and Practices

Description of EEO Policies and Practices		YES	NO
A.	Is it the Company's policy to recruit, hire, train, upgrade, promote and discipline persons without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual preference, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
B.	Has someone been assigned to develop procedures, which will assure that the EEO policy is implemented and enforced by managerial, administrative, and supervisory personnel? If so, please indicate the name and title of the official charged with this responsibility. Name: <u>Mr. L.J. Fallon</u> Title: <u>Sr. VP Legal Services & Human Resources</u> Telephone: <u>217-383-4059</u> Email: <u>LJ.Fallon@carle.com</u>	X	
C.	Does the company have a written Equal Employment Opportunity plan or statement? Note: If no, a copy of an EEO statement is enclosed. You must attach an EEO Statement in order to be considered eligible to do business with the City of Urbana. Questions? (217) 384-2455 or hro@city.urbana.il.us.	X	
D.	Has the company developed a written policy statement prohibiting Sexual Harassment? You must attach a copy of your company's Sexual Harassment Policy in order to be considered eligible to do business with the City of Urbana.	X	
E.	Have all recruitment sources been notified that the company will consider all qualified applicants without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
F.	If advertising is used, does it specify that all qualified applicants will be considered for employment without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
G.	Has the contractor notified all of its sub-contractors of their obligations to comply with the Equal Opportunity requirements either in writing, by inclusion in subcontracts or purchase orders?	N/A	
H.	Is the company a state certified minority/women owned business? If yes, please attach a copy of state certification.		X
I.	Does the company have collective bargaining agreements with labor organizations?		X
J.	If you answered yes to Question "I", have the labor organizations been notified of the company's responsibility to comply with the Equal Employment Opportunity requirements in all contracts with the City of Urbana?		N/A
K.	Does your company perform construction, rehabilitation, alteration, conversion, demolition or repair of buildings, highways or other improvements to real property? (If yes, please complete Table B.)		X
L.	Are you currently seeking to renew an existing or expired Urbana EEO certification? (If yes, you need to complete Table C.)	X	

SECTION III. Employment Information

IMPORTANT: Please complete the company workforce analysis on the bottom of this page. Use the number of employees as of the most recent payroll period. You must complete this form in its entirety, as instructed and submit your organization's (1) EEO Statement and (2) Sexual Harassment Policy in order to be eligible to do business with the City of Urbana. For detailed descriptions of the Job Classifications see attached descriptions. If minorities and females are currently under-represented in your workforce, please attach a copy of an explanation of your plan to recruit and hire qualified minorities and females.

TABLE A - TOTAL CONTRACTOR/VENDOR WORKFORCE

Job Categories	Overall Totals		White (Not of Hispanic Origin)		Black or African-American (Not of Hispanic Origin)		Hispanic or Latino		Asian or Pacific Islander		American Indian or Alaskan Native		2 or more races	
	M	F	M	F	M	F	M	F	M	F	M	F	M	F
	Officials & Mgrs	20	45	20	43	0	1	0	0	0	1	0	0	0
Professionals	52	169	46	151	4	11	0	4	1	3	0	0	1	0
Technicians	0	9	0	6	0	3	0	0	0	0	0	0	0	0
Sales Workers	3	11	3	9	0	0	0	1	0	0	0	0	0	1
Office & Clerical	14	102	9	81	3	15	2	3	0	2	0	0	0	1
Craft Workers (Skilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Operatives (Semi-Skilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laborers (Unskilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Service Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	89	336	78	290	7	30	2	8	1	6	0	0	1	2
M = MALE. Column B is sum of Rows D, F, H, J and L. F = FEMALE. Column C is sum of Rows E, G, I, K and M. Date of above Data: <u>6-10-17</u>														

TABLE B* - EMPLOYEES TO BE ASSIGNED TO CITY OF URBANA CONTRACT

Job Categories	TOTAL EMPLOYEES		BLACK EMPLOYEES		HISPANIC EMPLOYEES		OTHER MINORITY EMPLOYEES	
	M	F	M	F	M	F	M	F
Officials & Mgrs	N/A							
Professionals								
Technicians								
Sales Workers								
Office & Clerical								
Craft Workers (Skilled)								
Operatives (Semi-Skilled)								
Laborers (Unskilled)								
Service Workers								
TOTAL								

*Totals included in Table B should be a projection of numbers of persons to be employed in the performance of the City contract.

For Contractors: Data provided in Table B will be verified by worksite inspections.

TABLE C - WORKFORCE TURNOVER SINCE PREVIOUS EEO REPORT

Job Categories	TOTAL EMPLOYEES SEPARATED		MINORITY EMPLOYEES SEPARATED		TOTAL EMPLOYEES HIRED		MINORITY EMPLOYEES HIRED	
	M	F	M	F	M	F	M	F
Officials & Mgrs	0	1	0	0	2	0	0	0
Professionals	9	42	1	6	9	11	2	4
Technicians	0	1	0	1	0	0	0	0
Sales Workers	1	0	0	0	0	0	0	0
Office & Clerical	10	48	7	30	11	65	8	51
Craft Workers (Skilled)	0	0	0	0	0	0	0	0
Operatives (Semi-Skilled)	1	0	0	0	0	0	0	0
Laborers (Unskilled)	0	0	0	0	0	0	0	0
Service Workers	0	0	0	0	0	0	0	0
TOTAL	21	92	7	37	22	76	10	55

SECTION IV. Certification

By signing below, the company certifies that it has answered all of the foregoing questions truthfully to the best of its knowledge and belief and agrees that it/he/she will comply and abide by the City of Urbana's Code of Ordinances (Section 2-119).

Lauren Schmid
Signature

Lauren Schmid, V.P. Human Resources
Printed Name and Title

lauren.schmid@carle.com
E-mail Address

6/23/17
Date

SECTION V. Verification

Prior to submitting this form, please check the answers to the following questions to verify your completion of this form:

1. Did you fill in all of the appropriate boxes in the table in Section III, including the "TOTAL" row?

YES NO

2. Have you enclosed your company's EEO statement?

YES NO

3. Have you enclosed your company's Sexual Harassment policy?

YES NO

DEFINITIONS OF TERMS LISTED ON THE WORKFORCE STATISTICS FORM

(See previous Page)

DESCRIPTION OF RACE/ETHNIC CATEGORIES

Race /ethnic designations as used by the Department do not denote scientific definitions of anthropological origins. For the purposes of this report an employee may be included in the group to which he or she appears to belong, identifies with, or is regarded in the community as belonging. However, no person should be counted in more than *one* race/ethnic group. The race/ethnic categories for this report are:

White (Not of Hispanic origin). All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

Black of African-American (Not of Hispanic origin). All persons having origins in any of the Black racial groups of Africa.

Hispanic or Latino. All persons of Mexican, Puerto Rican, Cuban, Central of South American, or other Spanish culture or origin, regardless of race.

Asian or Pacific Islander. All persons having origins any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands and Samoa.

American Indian or Alaskan Native. All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

DESCRIPTION OF JOB CATEGORIES

Each employee should be counted in only one job category. Select the category containing the jobs most similar to that performed by the employee. The jobs listed in each category are intended to provide an example, not a complete list, of all job titles falling into that category.

Officials and managers. Occupations requiring administrative and managerial personnel who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of firm's operations. Includes: officials, executives, middle management, plant managers, department managers, and superintendents, salaried supervisors who are members of management, purchasing agents and buyers, railroad conductors and yard masters, ship captains, mates and other officers, farm operators and managers, and kindred workers.

Professionals. Occupations requiring either college graduation or experience of such kind and amount as to provide a comparable background. Includes: accountants and auditors, airplane pilots and navigators, architects, artists, chemists, designers, dietitians, editors, engineers, lawyers, librarians, mathematicians, natural scientist, registered professional nurses, personnel and labor relations specialist, physical scientist, physicians, social scientist, teachers, surveyors and kindred workers.

Technicians. Occupations requiring a combination of basic scientific knowledge and manual skill which can be obtained through 2 years of post high school education, such as is offered in many technical institutes and union colleges, or through equivalent on-the-job training. Include: computer programmers, drafters, engineering aides, junior engineers, mathematical aides, licensed, practical or vocational nurses, photographers, radio operators, scientific assistants, technical illustrators, technicians (medical, dental, electronic, physical science), and kindred workers.

Sales. Occupations engaging wholly or primarily in direct selling. Includes: advertising agents and sales workers, insurance agents and brokers, real estate agents, and brokers, stock and bond sales workers, demonstrators, sales workers and sales clerks, grocery clerks, and cashiers/checkers, and kindred workers.

Office and clerical. Includes all clerical-type work regardless of level of difficulty, where the activities are predominantly non manual though some manual work not directly involved with altering or transporting the products is included. Includes: bookkeepers, collectors (bills and accounts), messengers and office helpers, office machine operators (including computer), shipping and receiving clerks, stenographers, typists and secretaries, telegraph and telephone operators, legal assistants, and kindred workers.

Craft workers (skilled). Manual workers of relatively high skill level having a thorough and comprehensive knowledge of the processes involved in their work. Exercise considerable independent judgment and usually receive an extensive period of training. Includes: the building trades, hourly paid supervisors and lead operators who are not members of occupations, compositors and typesetters, electricians, engravers, painters (construction and maintenance), motion picture projectionists, pattern and model makers, stationary hand painters, coaters, bakers, decorating occupations, and kindred workers.

Operatives (semiskilled). Workers who operate machine or processing equipment or perform other factory-type duties of intermediate skill level which can be mastered in a few weeks and require only limited training. Includes: apprentices (auto service and stitchers, dryers, furnace workers, heaters, laundry and dry cleaning operatives, milliners, mine operatives and laborers, motor operators, oilers and greasers (except auto), painters (manufactured articles), photographic process workers, truck and tractor drivers, knitting, looping, taping and weaving machine operators, welders and flame cutters, electrical and electronic equipment assemblers, butchers and meatcutters, inspectors, testers and graders, handpackers and packagers, and kindred workers.

Laborers (unskilled). Workers in manual occupations which generally require no special training who perform elementary duties that may be learned in a few days and require the application of little or no independent judgment. Includes: garage laborers, car washers and greasers, groundskeepers and gardeners, farmworkers, stevedores, wood choppers, laborers performing lifting, digging, mixing, loading and pulling operation and kindred workers.

Service workers. Workers in both protective and nonprotective service occupations. Includes: Attendants (hospital and other institutions, professional and personal service, including nurses aides, and orderlies), barbers, charworkers and cleaners, cooks, counter and fountain workers, elevator operators, firefighters and fire protection, guards, doorkeepers, stewards, janitors, police officers and detectives, porters, waiters and waitresses, amusement and recreation facilities attendants, guides, ushers, public transportation attendants, and kindred workers.



Policy HR612

Subject	Equal Employment Opportunity		
Category / Section	Human Resources / Workplace Expectations & Guidelines		
Owner	Vice President of Human Resources		
Stakeholder/ Reviewer(s)			
Effective Date	04/10	Review Frequency	2 Years
Review Date	4/30/2012; 07/22/14; 07/15/16		
Revision Date	07/22/14		

Scope of Policy (Identifies the entities that are covered under the policy)			
X	All Carle Locations	Caring Place, The	SurgiCenter, LLC - Champaign
	Carle Hospital	Health Alliance	SurgiCenter - Danville
	Carle Physician Group	Home Health	SurgiCenter Recovery Centers
	Carle Foundation Physician Services	Home Infusion	Therapy Services
	AirLife	Hospice	Therapy Services - MTCH
	Arrow Ambulance	Medical Supply & Arabella Boutique	Windsor Court
	Auditory Oral School	Risk Management Company	Windsor of Savoy
	Cancer Center/Mills Breast Cancer Institute	Rx Express	
Scope Exclusions			

Purpose

- A. To implement the requirements of federal, state, and local legislation regarding equal employment opportunity.

Definitions N/A

Statement of Policy

- A. Carle Foundation (Carle) supports the concepts of Equal Employment Opportunity and pledges to conduct all personnel transactions without (i) discrimination because of race, color, creed, class, religion, sex, sexual orientation or preference, age, marital status, military status, certain unfavorable discharges from military service, veteran status citizenship, ancestry, national origin, physical or mental disability, personal appearance, matriculation, political affiliation, prior arrest or conviction record, or any other characteristic protected by law (the "Protected Characteristics"); or (ii) retaliation for engaging in conduct consistent with the public policy of the State of Illinois and any related local ordinance. It is Carle's commitment to comply with all state, federal and local equal employment opportunity laws and public policies.
- B. Employees are hired and promoted on the basis of their qualifications and ability to perform assigned work responsibilities in a skilled, efficient manner and in a positive and cooperative manner with other employees, volunteers, and customers of Carle. Carle does not use criteria or practices that have the effect of subjecting individuals to unlawful discrimination. This includes, but is not limited to hire, promotion, demotion, transfer, compensation, training and all Carle-sponsored activities.
- C. Carle is committed to complying with the Americans with Disabilities Act of 1990 ("ADA") and the Illinois Department of Human Rights Act ("IHRA") to ensure equal opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a nondiscriminatory basis.
- D. Hiring procedures have been reviewed and provide persons with disabilities meaningful employment opportunities. Pre-employment inquiries are made only regarding an applicant's ability to perform the essential functions of the position. Applicants who require reasonable accommodations during the hiring process should present those requests to the Human Resources Recruiter.

- E. Successful completion of post-offer medical examinations are required for those positions in which there is a bona fide job-related physical requirement. Such examinations are given to all persons entering the position only after a conditional job offer is extended. Costs associated with any post-offer/pre-employment medical examination will be borne by Carle. Medical records will be kept separate and confidential.
- F. Reasonable accommodations are available to all qualified persons with disabilities, where their disability affects the performance of essential job functions. If you need a reasonable accommodation to perform your job duties because of a physical or mental disability, you must contact the Vice-President of Human Resources or designee. You may be required to submit medical documentation or be examined by one or more medical professionals to determine the existence of a disability and the availability of various reasonable accommodations. All employment decisions are based on the merits of the individual, not the disability of the individual. Refer to Reasonable Accommodation (American Disabilities Act) – HR623.
- G. Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as in job assignments, classifications, training, advancement, position descriptions, and seniority. Leave of all types will be available to all eligible employees on an equal basis.
- H. Carle is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. Carle will follow any state or local law that provides individuals with disabilities greater protection than ADA.
- I. This policy is neither exhaustive nor exclusive. Carle is committed to taking all other actions necessary to ensure equal employment opportunity for qualified persons with disabilities in accordance with the ADA, the IHRA, and any other applicable federal, state, or local laws.
- J. Carle appreciates and values individual differences and strives to be a leader in promoting workplace diversity and inclusion. Carle values the contributions of all employees and purposefully reaches out to meet the unique and diverse needs of our service population. Although the term “diversity” is often used to refer to differences based upon ethnicity, gender, age, religion, disability, illness, national origin, and sexual orientation, diversity encompasses an infinite range of individuals’ unique characteristics and experiences, including communication styles, physical characteristics, such as height, weight, and socio-economic status. Carle believes leveraging its diversity enriches its performance, the communities in which Carle serves, and the lives of Carle employees. As Carle’s workforce evolves to reflect the growing diversity of its communities, its efforts to understand, value, and incorporate differences become increasingly important. Carle has established a number of initiatives to promote diversity within the organization, which further demonstrates this commitment in the communities Carle serves.

Procedure

- A. An employee with questions, complaints, or concerns about any type of discrimination, harassment or retaliation in the workplace must bring these issues to the attention of the Vice-President of Human Resources or designee. If the concern involves the conduct of the Vice-President of Human Resources, the problem should be reported to the Executive Vice President & Chief Legal/Human Resources Officer. If the concern involves the conduct of the Executive Vice President & Chief Legal/Human Resources Officer, the problem should be reported to the President.
- B. Employees can raise concerns and make reports without fear of retaliation. Carle will thoroughly investigate all claims of discrimination, harassment, or retaliation as soon as reasonably practicable. Anyone found to be engaging in any type of unlawful discrimination, harassment, or retaliation will be subject to disciplinary action up to and including termination of employment even if it does not rise to the level of a legal violation. [See also Workplace Harassment including Sexual Harassment – HR629.]

Attachments N/A

Other Related Links

[Reasonable Accommodation \(American Disabilities Act\) – HR623](#)
[Workplace Harassment including Sexual Harassment – HR629](#)

References N/A

Electronic Approval on File

L.J. Fallon
Executive Vice President & Chief Legal/Human Resources Officer

HR612

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07/15/16



Policy HR629

Subject	Workplace Harassment including Sexual Harassment		
Category / Section	Human Resources / Workplace Expectations & Guidelines		
Owner	Vice President of Human Resources		
Stakeholder/ Reviewer(s)			
Effective Date	04/10	Review Frequency	2 Years
Review Date	04/30/2012; 07/21/14; 07/15/16; 09/16/16		
Revision Date	04/30/2012; 07/21/14; 07/15/16; 09/16/16		

Scope of Policy (Identifies the entities that are covered under the policy)			
X	All Carle Locations	Caring Place, The	SurgiCenter, LLC - Champaign
	Carle Hospital	Health Alliance	SurgiCenter - Danville
	Carle Physician Group	Home Health	SurgiCenter Recovery Centers
	Carle Foundation Physician Services	Home Infusion	Therapy Services
	AirLife	Hospice	Therapy Services - MTCH
	Arrow Ambulance	Medical Supply & Arabella Boutique	Windsor Court
	Auditory Oral School	Risk Management Company	Windsor of Savoy
	Cancer Center/Mills Breast Cancer Institute	Rx Express	
Scope Exclusions			

Purpose

- A. To provide a work environment that is free from unwelcome conduct that is based on an individual's protected status under federal, state, or local law.

Definitions N/A

Statement of Policy

A. General Workplace Harassment

1. The Carle Foundation (Carle) is committed to providing a work environment that is free from all forms of harassment based on an individual's race, color, creed, class, religion, sex, sexual orientation or preference, age, marital status, military status, certain unfavorable discharges from military service, citizenship, ancestry, national origin, physical or mental disability, personal appearance, matriculation, political affiliation, prior arrest or conviction record, or any other characteristic protected by law (the "Protected Characteristics"). Refer to [Equal Employment Opportunity – HR612](#).
2. Any such harassment is strictly prohibited by Carle as well as by federal, state, and local law. Conduct prohibited by this policy is unacceptable in any Carle workplace as well as any work-related settings outside the workplace, such as business trips, business meetings, and business-related social events.
3. Any person engaging in harassment, including sexual harassment in the form of unwelcome sexual advances, requests for sexual favors, or other such verbal or physical conduct creating an intimidating, hostile, or offensive working environment may be discharged immediately.

B. Sexual Harassment

1. Sexual harassment means any unwelcome sexual advances or requests for sexual favors or any conduct of a sexual nature or because of a person's sex or sexual orientation when (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (ii) submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual, or (iii) such

conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

2. Sexual or other harassment can occur in a variety of circumstances. The victim as well as the harasser may be a woman or a man. The harasser can be the victim's supervisor, a coworker, a physician or a non-employee such as a patient, visitor, vendor or a volunteer. However, in all cases the harasser's conduct is unwelcome. Sexual harassment in violation of this policy includes but is not limited to:
 - a. Sexually suggestive or vulgar comments or jokes, inappropriate comments about another person's sexual behavior or body, or insulting or ridiculing an employee because of his or her gender;
 - b. Improper or intrusive questions or comment about an employee's romantic or sexual experiences or preferences, or unwelcome or offensive sexual flirtations, propositions, advances, or requests;
 - c. Using, displaying, or communicating words, objects, pictures, calendars, cartoons, articles, letters, e-mail messages, text messages, cell phone pictures, computer programs, Internet web sites and/or other forms of printed or electronic communication that denigrate, insult, offend, or ridicule based on a Protected Characteristic.
 - d. Making or threatening undesired physical contact (such as touching, embracing, or pinching) or impeding another's movements in a deliberate manner; and
 - e. Offering or providing employment benefits in return for sexual favors or an employee's agreement to provide sexual favors, or taking or threatening to take adverse action against an employee because the employee rejects requests for sexual favors.
 - f. It is important to note that sexual harassment does not have to involve conduct of a sexual nature in order to constitute unlawful behavior. For example, abusive, offensive, or demeaning behavior that is directed to members of one gender only (whether male or female) may be deemed a form of sexual harassment, even though the conduct was not motivated by sexual desire or gratification.

C. Discriminatory Harassment

1. Discriminatory harassment in violation of this policy includes, but is not limited to:
 - a. Comments or jokes that denigrate, insult, offend, or ridicule based on a Protected Characteristic;
 - b. Creating a hostile work environment or otherwise singling out an individual for abusive conduct based on that individual's Protected Characteristic; and
 - c. Using, displaying, or communicating words, objects, pictures, calendars, cartoons, articles, letters, e-mail messages, text messages, cell phone pictures, computer programs, Internet web sites and/or other forms of printed or electronic communication that denigrate, insult, offend, or ridicule based on a Protected Characteristic.
 - d. Even if such actions do not rise to the level of legally actionable conduct, they nonetheless are prohibited in our workplace.

D. Responsibility of Individual Employees

1. Each individual employee has the responsibility to refrain from sexual and other forms of harassment in the workplace, or while participating in work-related events or activities. An individual employee who harasses a fellow worker is, of course, liable for his or her individual conduct. The harassing employee will be subject to disciplinary action up to and including, termination of employment.
2. If you believe that you or any other employee has been the victim of harassment, discrimination, or any other violation of this policy, report the conduct to Management as set forth in Section G even if you think Management is or should be aware of the situation. Any such report should be made promptly so that, whenever possible, any problem can be remedied at the earliest opportunity.

E. Responsibility of Supervisory Personnel

1. Each supervisor is responsible for maintaining the workplace free of harassment. This is accomplished by promoting a professional environment and by promptly dealing with harassment as well as all other forms of employee misconduct.
2. Specifically, a supervisor must address an observed incident of harassment or a complaint with seriousness, promptly report it to the Vice-President of Human Resources, or her or his designee, and maintain confidentiality. This also applies to cases where an employee tells the supervisor about the behavior considered harassment but does not want to make a formal complaint.
3. In addition, supervisors must ensure that no retaliation will result against an employee making a harassment complaint.

F. Direct Communication of Unwelcomeness

1. Any employee who either observes or believes herself or himself to be the object of harassment should deal with the incident as directly and firmly as possible. If there is harassing behavior in the workplace, the harassed employee should directly and clearly express his or her objection that the conduct is unwelcome and request that the offending behavior stop.
2. The initial message may be verbal. However, if subsequent messages are needed, they should be put in writing in a note or memo.

G. Procedures for Filing a Complaint

1. At the same time direct communication is undertaken, or in the event the employee feels threatened or intimidated by the situation, the problem must be promptly reported to the Vice-President of Human Resources or her or his designee. If the harasser is the Vice-President of Human Resources, the problem should be reported to the Executive Vice President, Chief Legal & Human Resources Officer.
2. All reports of such conduct will be investigated promptly handled as confidentially as possible consistent with doing an appropriate investigation, and dealt with appropriately.
3. No one making a complaint will be retaliated against even if a complaint made in good faith is not substantiated. In addition, any witness will be protected from retaliation.

H. Resolution of Complaints

1. All reports of harassment will be investigated promptly and handled as confidentially as possible consistent with conducting an investigation. Every effort will be made to conclude the investigation within 30 days of the date that the employee reports the incident. Upon conclusion of the investigation, the complaining employee will be advised of the findings of the investigation, and any action to address the complaint. No employee or other individual will be subject to retaliation of any kind based upon his/her good faith reporting of an incident or complaint, or for participating in any investigation of any incident of complaint.

I. Resolution outside Company

1. An employee has the right to contact the Illinois Department of Human Rights (IDHR) or the Equal Employment Opportunity Commission (EEOC) regarding filing a formal complaint, which must be filed within 180 of the alleged incident. A filing with the EEOC must be filed within 300 days. In addition, an appeal process is available through the Illinois Human Rights Commission, (IHRC) after IDHR has completed its investigation of the complaint. Where the employing entity has an effective sexual harassment policy in place and the complaining employee fails to take advantage of that policy and allow the employer an opportunity to address the problem, such an employee may, in certain cases, lose the right to further pursue the claim against the employer.

Administrative Contacts

Illinois Department of Human Rights (IDHC)

Chicago: 312-814-6200

Springfield: 217-785-5100

Marion: 618-993-7463

Illinois Human Rights Commission (IHRC)

Chicago: 312-814-6269

Springfield: 217-785-4350

United States Equal Employment Opportunity Commission (EEOC)

Chicago: 800-669-4000

Procedure N/A

Attachments N/A

Other Related Links

[Equal Employment Opportunity – HR612](#)

References N/A

Electronic Approval on File

Laurence J. Fallon
Executive Vice President and Chief Legal & Human Resource Officer
HR629

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