

HUMAN RESOURCES POLICY

POLICY TITLE	EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION
POLICY NUMBER	HR-0101
Original Issue Date:	June 25, 1984
Effective Date of Prior Version:	October 1, 2021
Effective Date of Current Version:	October 1, 2022
Review Date:	October 1, 2022 <input checked="" type="checkbox"/> Updated <input type="checkbox"/> No Update
Next Scheduled Review Date:	September 1, 2023
Owner:	Human Resources
Author:	Danielle Ninfo
Approver:	Jodi Blanch

I. DESCRIPTION/BACKGROUND

This policy applies to Capital Blue Cross and its directly and indirectly owned subsidiaries, affiliates, and employees, collectively referred to as “Capital” or “Company.” Exceptions to this policy are noted within the applicability matrix found here ([Click Here](#)).

This document summarizes the policy of Capital regarding Equal Employment Opportunity/Affirmative Action. It also provides guidelines and outlines management responsibilities for administration of the Company’s Equal Employment Opportunity/Affirmative Action Program.

II. DEFINITIONS

EEO – Equal Employment Opportunity

The administration of all terms and conditions of employment without regard to race, color, religion, national origin, gender, sexual orientation, gender identity, age, genetic information, disability, veteran status, or marital status.

AAP – Affirmative Action Program

The annual written plan, in which a government contractor analyzes all employment activities over the past year and incorporates a set of specific and results-oriented procedures to which it commits to apply every good-faith effort to achieve. AAPs are created and maintained as required by law.

III. POLICY

Capital is an equal opportunity/affirmative action employer and does not discriminate on the basis of race, color, religion, national origin, gender, sexual orientation, gender identity, age, genetic information, disability, veteran status, or marital status.

This policy applies to all employees and applicants for employment and to all personnel decisions and related practices within the Company, including, but not limited to, recruitment, selection, promotion, compensation, benefits, training, transfers, layoffs, return from layoff, and all educational, social, and recreational programs. The Company makes and will continue

HUMAN RESOURCES POLICY

POLICY TITLE	EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION
POLICY NUMBER	HR-0101

to make reasonable accommodations to promote the employment of qualified individuals with disabilities and disabled veterans unless such accommodations would impose an undue hardship on the Company's business.

All levels of management are held accountable for assuring that this policy is implemented and supported in their respective areas. Advice and assistance is provided by the EEO/AAP Executive, EEO/AAP Officer, and/or Human Resources staff, as needed.

Violation of this policy may result in corrective action by the Company up to and including termination.

Threats, Intimidation, and Retaliation

Threats of harm and other acts intended to intimidate an employee are specifically prohibited, and employees who are subject to (or witness to) such conduct should immediately report the matter as outlined below.

Retaliation taken against an employee who comes forward with a good faith complaint, report or concern of EEO/AA non-compliance will not be tolerated. An employee who is found to have engaged in retaliation or condoned this type of behavior against another employee in violation of the Company's policy will be subject to corrective action up to and including termination of employment.

Reporting Procedure

Any employee who is aware of EEO/AA violations taking place in the workplace, or who believes he/she is being harassed or threatened, is required to report the matter promptly to:

- The Senior Vice President, Human Resources, or
- The Vice President, HR Strategy & Operations, or
- Director, HR Business Partners, or
- A Human Resources Business Partner, or
- Their current manager

If, for any reason, reporting to any of the above-listed staff is not possible or appropriate under the circumstances, the matter can be reported to the Compliance and Ethics Department in person, via telephone, via the Compliance and Ethics Hotline, Email, utilizing the Compliance and Ethics complaint anonymous drop boxes, or anonymously via inner-office mail.

When receiving reports of EEO/AA violations, or incidents of harassment, the management or Human Resources employee should document all details in writing, including the date(s) of the incident(s), a description of what occurred, and the names of potential witnesses. An employee who reports incidents of EEO/AA violations or harassment may be asked by management or Human Resources to review and confirm the accuracy of any written report by signing the report.

Any member of management who receives an EEO/AA violation or a complaint of harassment must immediately report the complaint to the VP, HR Strategy & Operations.

HUMAN RESOURCES POLICY

POLICY TITLE	EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION
POLICY NUMBER	HR-0101

Investigations

When an EEO/AA complaint is received, Capital promptly investigates the allegations in a fair and expeditious manner. The investigation is conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Such an investigation may include private interviews of the person filing the complaint and of relevant witnesses. The Company may also interview the person alleged to have committed the EEO/AA violation. When the investigation is completed, Capital will, to the extent appropriate, inform the person who filed the complaint and the person alleged to have committed the conduct of the results of the investigation.

If it is determined that inappropriate conduct has occurred, Capital will act promptly to eliminate the offending conduct, and where appropriate, impose corrective action up to and including termination of employment.

Any employee who is dishonest during the course of reporting a complaint or during an EEO/AA or harassment investigation may be subject to corrective action, as appropriate.

DELEGATED RESPONSIBILITY

EEO/AAP Executive

The VP HR Strategy & Operations is responsible for reviewing the Company's Equal Employment Opportunity/Affirmative Action Program, recommending revisions, and informing the EEO/AAP Executive (Senior Vice President, Human Resources) of any changes. The EEO/AAP Executive is responsible, in turn, for informing the President of the Company of on-going progress in working toward affirmative action goals.

EEO/AAP Officer

As the EEO/AAP Officer, the VP, HR Strategy & Operations is responsible for the Company's Equal Employment Opportunity/Affirmative Action Program. This responsibility includes assuring all placements and choices for employment are consistent with our EEO/AAP goals and communicating them to division and department heads; advising and counseling management; measuring the effectiveness of the Program; serving as liaison between the Company and the Office of Federal Contract Compliance Programs; and establishing liaison with organizations and community action groups concerned with employment opportunities for minorities, women, veterans, and people with disabilities.

Senior Team Direct Reports

Senior Team members reporting directly to the President and CEO are responsible for implementing the EEO/AAP within their areas of responsibility and for communicating department goals and overseeing efforts toward achieving them with their management teams. In addition to the cascading of AAP goals from the Executive Leadership Team to respective management team, at the onset of each job search, hiring management is notified by the Human Resources recruiter of recruitment goals (if any) for the respective open position(s). Further, the Company's Affirmative Action obligations are communicated to managers.

HUMAN RESOURCES POLICY

POLICY TITLE	EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION
POLICY NUMBER	HR-0101

All Other Management Staff

All other management staff are responsible for:

- Reviewing and maintaining a working knowledge of and responsibility for the Company's AAP commitment throughout the Company.
- Reviewing the qualifications of and assuring non-discriminatory consideration for all employees and external candidates in all aspects of employment and employment practices.

IV. RELATED INFORMATION/QUESTIONS

Refer to the Human Resources Corporate Policy Manual for related and additional information, including, but not necessarily limited to the following policies:

- RC-715, Code of Conduct

Direct any questions to the VP, HR Strategy & Operations, or your Human Resources Business Partner (Dominion National VP, Human Resources or Capital HR Business Partner).

