3.110 RCUH Equal Employment Opportunity

Effective Date: 09/30/2025
Prior Dates Amended: 04/03/2017, 04/12/2017, 08/08/2017, 10/27/2017, 07/17/2018, 05/26/2022, 03/07/2023

I. PURPOSE

RCUH is an equal employment opportunity employer. The purpose of this policy is to ensure compliance with federal and state laws and a workplace that is free from all forms of discrimination, harassment, and retaliation. This policy applies to all RCUH employees and supervisors regardless of employment category, status, or FTE. It also applies to job applicants, former employees, and participants in a training or apprenticeship program.

II. DEFINITIONS

A. **DISCRIMINATION:** Treating someone differently, or less favorably, on the basis of a protected class.

B. **EQUAL EMPLOYMENT OPPORTUNITY (EEO):** The fair treatment of all individuals in all phases of recruitment, selection, hiring, and employment terms and conditions without regard to a protected class under applicable federal and state laws, as amended.

C. **HARASSMENT:** Conduct that is unwelcome, reasonably offensive, or related to a protected characteristic.

D. **PROHIBITED CONDUCT:** Any abusive, intimidating, hostile, offensive, or other unwelcome verbal, non-verbal, or physical conduct based on grounds protected under applicable federal and state laws.

E. **PROTECTED ACTIVITY:** An activity that protects an employee's right to pursue unlawful discrimination or harassment, participate in a workplace discrimination or harassment investigation or proceeding, or make a request for reasonable accommodation.

F. **PROTECTED CLASS:** Groups protected from employment discrimination under federal and state laws. Includes race, color, religion, sex, sexual orientation, national origin, ancestry, age (over 40), disability, genetic information, pregnancy, arrest and court record, marital status, reproductive health decision, citizenship, gender identity or expression, domestic or sexual violence victim status, military/veteran status, or other grounds as amended by law.

G. **RETALIATION:** An adverse action against an employee for engaging in a protected activity. Examples of retaliation include intimidation, threats, coercion, firing, demotion, discrimination against any individual, or any other action likely to deter a reasonable person from pursuing their rights.

III. RESPONSIBILITIES

A. RCUH Employee:

1. Complete UH Title IX Training (required for those who work for UH projects) **OR** RCUH's EEO/Sexual Harassment Prevention for Employees within 30 days of hire and recertify annually. Refer to Policy 3.270 Mandatory Training for RCUH Employees for additional details.

2. If a complainant or a witness to the violation, immediately report violations or suspected violations of RCUH employment discrimination, harassment, and/or retaliation to the RCUH Director of Human Resources or RCUH Human Resources staff. Complaints will be kept confidential to the extent possible.

3. Complete the RCUH EEO Complaint Form if employment discrimination, harassment, and/or retaliation has occurred. Submit the form to the RCUH Director of Human Resources at rcuhhrdirector@rcuh.com or RCUH Human Resources at rcuhhr@rcuh.com. Complaints may also be made verbally to the RCUH Director of Human Resources.

4. If requested, participate in a confidential investigation relating to an RCUH employment discrimination, harassment, and/or retaliation complaint.

5. If desired, the complaint may be withdrawn by completing the RCUH Withdrawal of Complaint and Release Form. However, RCUH may still conduct an investigation into the allegation.

B. Principal Investigator:

1. Post the Equal Employment Opportunity Policy Statement and "Know Your Rights" in a location readily accessible by employees.

2. Complete RCUH EEO/Sexual Harassment Prevention training for supervisors. Register here for access to the online, self-directed training in the RCUH Training Portal.

3. Immediately report violations or suspected violations of RCUH employment discrimination, harassment, and/or retaliation to the RCUH Director of Human Resources or RCUH Human Resources.

4. Complete the RCUH EEO Complaint Form if employment discrimination, harassment, and/or retaliation has occurred. Submit the form to the RCUH Director of Human Resources at rcuhhrdirector@rcuh.com or RCUH Human Resources at rcuhhr@rcuh.com. Complaints may also be made verbally to the RCUH Director of Human Resources.

5. If requested, participate in a confidential investigation relating to an RCUH employment discrimination, harassment, and/or retaliation complaint.

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C. RCUH:

1. Provide general guidance for informal inquiries.

2. Receive complaint.

3. Conduct a fact-finding investigation. The investigation process shall be completed within a reasonable period (i.e., up to 45 working days from receipt of the complaint). If an extension is necessary, the RCUH investigator will notify the complainant.

IV. POLICY

RCUH requires all employees and supervisors to comply with EEO requirements to ensure a workplace that is free from all forms of discrimination and harassment. Training and education programs are conducted to educate employees and supervisors about EEO and sexual harassment. Training is mandatory within 30 days of the employee's initial hire and recertification must be completed annually. The completion of mandatory training is a requirement for employee good standing, performance-based compensation, and continued employment with RCUH.

This policy applies to all phases of recruitment, selection, hiring, placement, transfer, promotion, compensation, benefits, leaves of absence, discipline, termination, education and training programs, employee activities, and all other decisions affecting any employee or applicant. Additionally, all RCUH equipment, including computers, email, and telephones, must be used in accordance with this policy.

As reasonable people may have differing views of what constitutes discrimination, harassment, and/or unwelcome behavior, employees should avoid any conduct that may reasonably be perceived as such. The conduct need not be sufficiently severe or pervasive to constitute unlawful discrimination or harassment, but it may still constitute a violation of this policy. Severe and/or pervasive conduct creates an intimidating, hostile, or offensive work environment or unreasonably interferes with an employee's

work performance, leading to violations of not only RCUH policy, but also federal and/or state or local law.

Employees need not, and should not, wait to report violations or suspected violations until they believe it has become severe or pervasive or a violation of law. RCUH intends to stop any inappropriate conduct before it rises to the level of a violation of law.

RCUH prohibits retaliation against any individual who files a complaint of discrimination or harassment, provides information related to such complaints, or participates in an investigation of discrimination or harassment.

Violation of this policy may result in severe disciplinary action, up to and including termination of employment.

V. CONTACT INFORMATION

RCUH Human Resources Director
Telephone: (808) 956-7100
Email: rcuhhrdirector@rcuh.com

RCUH Human Resources Department
Email: rcuhhr@rcuh.com

VI. REFERENCES

A. RCUH EEO Complaint Form
B. RCUH Withdrawal of Complaint and Release
C. Equal Employment Opportunity Policy Statement
D. Know Your Rights
E. Policy 3.120 Sexual Harassment
F. Policy 3.270 Mandatory Training for RCUH Employees