

THE VALLEY COLLEGE OF OSTEOPATHIC MEDICINE

Non-Discrimination Policy

Policy Number: INST-1.4a

Effective Date: January 2, 2024

Revisions and Dates:

Responsible Party: President & CEO

Approved by: Andrew High, JD, MBA, CEO

It is the firm policy of THE VALLEY COLLEGE 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

The Valley College of Osteopathic Medicine strives to create and maintain a work and learning environment in which people are treated with dignity, decency, and respect. The environment of the college should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Employees and students 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 COM 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 COM, 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 the firm policy of THE VALLEY COLLEGE 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. It is a violation of COM 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 COM 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.

Title IX Regulations

All members of the COM community should be aware that the COM is concerned about discrimination, harassment, and retaliation and is 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 COM considers discrimination, harassment in all its forms, and retaliation to be a serious offense. These types of conduct create exposure and liability for The Valley College 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 COM 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.

COM 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 COM, but who perform work at the COM 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.