

DDOK POLICY MANUAL

Policy: Equal Employment Opportunity Policy

Effective: 02-01-2004

Revised: 03-07-2019

Reviewed: 03-07-2019

Equal Employment Opportunity Policy

Objective:

Delta Dental of Oklahoma (DDOK) is an equal opportunity employer. In accordance with anti-discrimination law, it is the purpose of this policy to outline these principles and mandates. DDOK prohibits discrimination and harassment of any type and affords equal employment opportunities to employees and applicants without regard to race, color, religion, sex, pregnancy, national origin, age, disability, genetic information, sexual orientation, gender identity or expression.

DDOK conforms to the spirit as well as to the letter of all applicable laws and regulations. Additionally, DDOK will take action to employ, advance in employment and treat qualified Vietnam-era Veterans and Disabled Veterans without discrimination in all employment practices.

Scope:

The policy of Equal Employment Opportunity (EEO) and anti-discrimination applies to all aspects of the relationship between Delta Dental of Oklahoma and its employees, including:

- Recruitment
- Employment
- Promotion
- Transfer
- Training
- Working Conditions
- Employee Benefits and Application of Policies
- Wage and Salary Administration

The policies and principles of Equal Employment Opportunity also apply to the selection and treatment of independent contractors, personnel working on our premises who are employed by temporary agencies and any other person or firms doing business for or with Delta Dental of Oklahoma.

Dissemination and Implementation of Policy:

The Sr. Management of Delta Dental of Oklahoma will be responsible for the dissemination of this policy. Directors, managers and supervisors are responsible for implementing equal employment practices within each department. The Human Resources department is responsible for overall compliance and will maintain personnel records in compliance with applicable laws and regulations.

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Procedures:

Delta Dental of Oklahoma administers our EEO policy fairly and consistently by:

- Posting all required notices regarding employee rights under EEO laws in areas highly visible to employees
- Advertising for job openings with the statement “Equal Opportunity Employer Minority/Female/Disability/Veterans” Posting all required job openings with the appropriate state agencies
- Forbidding retaliation against any individual who files a charge of discrimination, opposes a practice believed to be unlawful discrimination, reports harassment, or assists, testifies or participates in an EEO agency proceeding.
- Requires employees to report to a member of management, or Human Resources any apparent discrimination or harassment. The report should be made within 48 hours of the incident.
- Promptly notifying the legal advisors of all incidents or reports of discrimination or harassment and takes other appropriate measure to resolve the situation.

Harassment:

Harassment is a form of unlawful discrimination and violates Delta Dental of Oklahoma policy. Prohibited sexual harassment, for example, is defined as unwelcome sexual advances, requests for sexual favors and other verbal, written or physical conduct of sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment.
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals.
- Such conduct has the purpose or effect of substantially interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

Delta Dental of Oklahoma encourages employees to report all incidents of harassment to a member of management or the Human Resources department. DDOK conducts harassment prevention training for all employees, and maintains and enforces a separate policy on harassment prevention, complaint procedures and penalties for violations. DDOK investigates all complaints of harassment promptly and fairly, and, when appropriate, takes immediate corrective action to stop the harassment and prevent it from recurring.

Remedies:

Violations of this policy, regardless of whether an actual law has been violated, will not be tolerated. Delta Dental of Oklahoma will promptly, thoroughly and fairly investigate every issue

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that is brought to its attention in this area and will take disciplinary action, when appropriate, up to and including termination of employment.