

**BLUEKC**  
**EQUAL EMPLOYMENT OPPORTUNITY POLICY**

It is the policy of the Blue Cross Blue Shield of Kansas City to:

1. Recruit, hire, train and promote into all job classifications, the most qualified persons without regard to race, color, national origin, sex, sexual orientation, gender identity, religion, age, status as a protected veteran or an individual with a disability, or any other protected group status or non-job related characteristic as directed by law.
2. Make employment and promotional decisions by utilizing reasonable standards based on the individual's qualifications as they relate to a particular job vacancy, in accordance with equal employment opportunity requirements.
3. Administer all personnel actions relating to the terms, conditions, and privileges in a nondiscriminatory manner.

Such action shall include, but not be limited to the following; employment, upgrading, demotion, transfer, recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship.

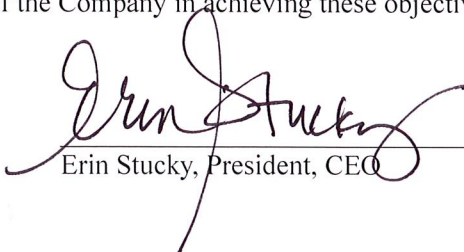
Emanuel McCrainey, DVP DEI and Talent Acquisition, is the designated EEO Coordinator at the Company. The EEO Coordinator's responsibility is to implement and to monitor adherence to this policy. Employees should feel free to contact Emanuel McCrainey should they experience and problems.

Any employees or applicants with questions or concerns about any type of discrimination in the workplace are responsible to bring these issues to the attention of their immediate supervisor or the EEO Coordinator. Employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, or coercion, or discrimination because they; (1) file a complaint with Blue Cross Blue Shield of Kansas City or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or its implementing regulations.

I personally make my commitment to all of the objectives of equal employment opportunity and expect the cooperation and participation of all employees of the Company in achieving these objectives.

3.11.24

Date

  
Erin Stucky, President, CEO

Distributed: all personnel



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## **Anti-Harassment**

Blue KC is committed to treating all Employees with respect and fairness. To demonstrate our commitment, the Company strives to ensure the right of every Employee to voice concerns about his or her treatment and to have those concerns heard in an atmosphere of respect and cooperation. For information on how to raise concerns, see the section titled Problem and Conflict Resolution.

## **Equal Employment Opportunity**

Blue KC maintains a continuing policy of nondiscrimination in employment. It is our policy to provide equal opportunity in all phases of the employment process and in compliance with applicable federal, state, and local laws and regulations. This policy of nondiscrimination shall include, but not be limited to, the following employment decisions and practices: hiring; upgrading; promotions; demotions or transfers; layoffs; recalls; terminations; rates of pay or other forms of compensation; selection for training, including apprenticeship; and recruitment or recruitment advertising.

Blue KC will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with Blue KC's legal duty to furnish information.

Employees and applicants of Blue KC will not be subjected to any form of harassment, discrimination, or retaliation for exercising rights protected by, or because of their participation in, an investigation or compliance review related to Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act, the Americans with Disabilities Act, Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998, or any other federal or state nondiscrimination law, rule, or regulation.

Blue KC also maintains affirmative action programs to implement our equal employment opportunity policy. Employees or applicants who wish to review appropriate portions of these programs may schedule an appointment to do so by contacting Human Resources during normal business hours.

An Employee who feels that he or she has experienced or observed discrimination on the basis of a protected category as described above should report such incidents to his or her immediate Manager, his or her next level Manager, or Human Resources or according to the Problem and Conflict Resolution procedure herein, without fear of reprisal. The Company encourages Employees to report incidents of



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alleged discrimination, regardless of the offender's identity or position. The Company also encourages the prompt reporting of complaints or concerns so that corrective action can be taken. The Company will not tolerate retaliation because an Employee reports discrimination or because an Employee provides information in connection with any such complaint. Complaints or concerns will be reviewed by Human Resources and appropriate corrective action taken, when deemed necessary, to ensure that inappropriate language, conduct, or other forms of potential discrimination do not persist.

## **Reasonable Accommodations**

The Company is committed to helping all Employees perform the essential functions of his or her job with or without reasonable accommodations. Furthermore, the Company will not discriminate against qualified disabled individuals in regard to hiring, placement, promotion, corrective action, discipline, termination, transfer, leave of absence, compensation, training, and all other terms, conditions, or privileges of employment.

In addition, if an Employee has any questions about this policy, the meaning of terms used in this policy, the application of this policy, or wants to make a request for reasonable accommodation, he or she should contact a member of the Human Resources Department. After receiving an oral or written request for a reasonable accommodation, the Company will engage in an interactive dialogue with the Employee to determine the precise limitations of the disability and explore potential reasonable accommodations that could overcome those limitations. The Company encourages suggestions for specific reasonable accommodations that would allow the Employee to perform the job. However, the Company is not required to make the specific accommodation requested by an Employee and may provide an alternative, effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the Company.

## **Non-Harassment and Non-Discrimination**

Blue KC is dedicated to providing and maintaining the best possible environment for all Employees and is committed to promoting a professional work environment free from inappropriate conduct, including behavior that may constitute unlawful harassment, discrimination, and/or retaliation.

In order to maintain an atmosphere where these goals can be accomplished, the Company does not tolerate offensive or inappropriate conduct on the basis of any protected status including, but not limited to, race, color, age, religion, sex, sexual orientation, or effectual preference, gender identity or expression, genetic characteristics, or information, marital status, citizenship, national origin or ancestry, disability and/or veteran status, or any other characteristic protected by applicable federal, state, or local law. This policy protects all Employees, as well as applicants of the Company from being subjected to inappropriate conduct or other behavior (from any source) that may constitute harassment or discrimination. It is the responsibility of each Employee to comply with the provisions of this policy and to report any prohibited conduct pursuant to the Reporting Procedure within the Problem and Conflict Resolution section on Page 10. Employees, likewise, are



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prohibited from engaging in inappropriate behavior towards other Employees or third parties, including persons doing business with or for the Company. Violations of this policy may result in corrective action, up to or including termination of employment. No Employee will be subject to any form of retaliation or discipline for making or pursuing a harassment complaint.

## **Workplace Harassment Prevention**

Any conduct, whether verbal, physical, virtual, or visual that may create a hostile, offensive or intimidating work environment based on a protected characteristic is prohibited. Harassment may include, but is not limited to, the following:

## **Sexual Harassment**

Sexual harassment may include (but is not limited to) unwanted sexual advances, requests for sexual favors or visual, verbal, virtual, or physical conduct of a sexual nature when: (1) submission to such conduct is made a term or condition of employment; (2) submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an Employee's work performance or creating an intimidating, hostile or offensive working environment.

This definition includes many forms of offensive behavior. Unacceptable conduct that is prohibited may include, but is not limited to, the following:

- Unwanted sexual advances, including but not limited to, verbal sexual advances or propositions.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct such as leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, or posters.
- Improper language such as making or using gender-based derogatory comments, epithets, slurs, sexually explicit jokes, comments about an Employee's body or dress, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes, or invitations.
- Physical conduct such as touching, assault, or impeding or blocking movements.
- Emails, text-messages, social media messages or contact, and other forms of electronic communication that contain inappropriate and/or sexual language, pictures, messages.
- Retaliation for reporting conduct prohibited by this policy or threatening to report conduct prohibited by this policy.

These behaviors (and other similar behaviors) are prohibited by the Company. This prohibition extends to inappropriate conduct that may constitute harassment involving persons of either the same or opposite sex. Any Employee who believes they have witnessed or been subjected to such behavior is strongly encouraged to report the behavior as set forth in the Reporting Procedure.



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## **Other Forms of Harassment**

Prohibits harassment based on other applicable protected categories such as race, color, age, religion, sex, sexual orientation or effectual preference, gender identity or expression, genetic characteristics or information, marital status, citizenship, national origin or ancestry, disability and/or veteran status, or any other characteristic protected by applicable federal, state or local law. Unacceptable behavior under this policy can occur through unwelcome verbal, physical, virtual, visual, or other activity directed at an Employee due to their protected status. Other types of unacceptable conduct that is prohibited under this policy may include, but is not limited to, the following:

- Jokes, written or verbal, that are derogatory about one's religion or religious creed.
- Cartoons or pictures that are negative or offensive about ancestry, nationality, or race.
- Comments or conduct that are offensive based on one's disability or age.
- Emails, text messages, social media contact or messages, or other forms of electronic communication that contain inappropriate material about race, color, national origin, or religion.
- Retaliation for reporting conduct prohibited by this policy or threatening to report conduct.

Any Employee who believes he or she has been subjected to such behavior should report the behavior as set forth in the Reporting Procedure herein. If an Employee is uncertain as to what conduct is prohibited under this policy, he or she should contact his or her Manager, next level Manager, Human Resources, or pursuant to the Reporting Procedures.

## **Anti-Retaliation**

The Company prohibits unlawful retaliation against any Employee, including but not limited to any form of discipline, reprisal, intimidation, or other form of retaliation for participating any activity protected by law. Examples of protected activity may include, but are not limited to:

- Raising a good faith complaint of harassment or discrimination,
- Complaining about violations of wage and hour laws,
- Providing information or participating in an internal investigation related to a complaint of harassment or discrimination,
- Supporting another Employee's internal or administrative complaint of unlawful discrimination,
- Requesting a reasonable accommodation under the Americans with Disabilities Act (and/or applicable state law) or
- Requesting or taking leave under the Family and Medical Leave Act (FMLA).

The examples above are illustrative only, and not exhaustive. No form of retaliation for any protected activity will be tolerated. If you believe that you have been retaliated against, you should immediately report it to your Manager, next level Manager, Human Resources, or pursuant to the





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Reporting Procedure within the Problem and Conflict Resolution.

## **Diversity And Inclusion Statement**

Blue KC's Employees come from many backgrounds and cultures. The Company believes that diversity and inclusion is a fundamental and indispensable objective that strengthens the Company and prepares Blue KC to lead into the future. Blue KC is not only committed to ensuring compliance with equal opportunity laws, but also has a deeper commitment to the principle that diversity and inclusion will help the Company realize our greatest potential as a Company and maximize the potential of all Employees.

**EXHIBIT B (300)**  
**INVITATION TO SELF IDENTIFY TO ALL EMPLOYEES AND APPLICANTS**

Blue Cross and Blue Shield Kansas City is a government subcontractor subject to Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans Readjustment Assistance act of 1974, as amended, which require government contractors and subcontractors to take affirmative action to employ and advance in employment, qualified individuals with disabilities, qualified disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans and Armed Forces service medal veterans. If you are a disabled veteran, recently separated veteran, active duty wartime or campaign badge veteran, Armed Forces service medal veteran, or disabled, and would like to be included under our affirmative action program, please tell us.

You may inform us of your desire to benefit under the program at this time and/or at any time in the future. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment.

This information will assist us in placing you in an appropriate position and in making accommodations to your disability. Blue KC will continue to recruit, hire, train and promote qualified persons without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, status as a protected veteran or an individual with disability. Information you submit concerning your disability or protected veteran status shall be kept confidential, except that:

1. Supervisors and managers may be informed regarding restrictions of the work or duties of individuals with disabilities and regarding necessary accommodations;
2. First aid and safety personnel may be informed, when and to the extent appropriate, if you have a condition that might require emergency treatment; and
3. Government officials engaged in enforcing the law administered by OFCCP or the Americans with Disabilities Act, may be informed.

The information provided will be used only in ways that are not inconsistent with section 503 of the Rehabilitation Act of 1973 or the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended.

If you are an individual with disability or a disabled veteran it would assist us if you tell us whether there are accommodations we could make that would enable you to perform the essential functions of the job, including special equipment, changes in the physical layout of the job, changes in the way the job is customarily performed, provision of personal assistance services or other accommodations. This information will assist us in making reasonable accommodations for your disability.

Pursuant to these regulations, we have developed an Affirmative Action Plan for Individuals with Disabilities and Protected Veterans which is on file in the Human Resources Office and is available for employees between 8:00 a.m. and 5:00 p.m., Monday through Friday.

Any employee who believes he or she is covered by the provisions of one of these Acts and desires consideration under the AAP should contact Emanuel McCrainey, Department Vice President for Diversity and Talent Acquisition, (816) 395-2098.

## **EXHIBIT C**

### **NOTICE TO ALL EMPLOYEES AND APPLICANTS**

It is the policy of Blue Cross and Blue Shield Kansas City to recruit, hire, train and promote, into all job classifications, the most qualified persons without regard to race, color, national origin, sex, sexual orientation, gender identity, religion, age, status as a protected veteran or an individual with disability. Also employment and promotional decisions will be based on valid job requirements and by utilizing reasonable standards.

Emanuel McCrainey, Department Vice President for Diversity and Talent Acquisition, is the designated EEO Coordinator at the Company. The EEO Coordinator's responsibility is to implement and to audit and monitor adherence to this policy.

Any employees or applicants with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or the EEO Coordinator. Employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they: (1) file a complaint with Blue KC or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or its implementing regulations.

The Affirmative Action Plan for Individuals with Disabilities and Protected Veterans is on file in the Human Resources Office and is available for employee and applicant review between 8:00 a.m. and 5:00 p.m., Monday through Friday. Any employee or applicant who would like to review the Affirmative Action Plan for Individuals with Disabilities and Protected Veterans should contact McCrainey, Department Vice President for Diversity and Talent Acquisition, (816) 395-2098.

Erin Stucky, President and Chief Executive Officer, is committed to all of the above objectives of equal employment opportunity and expects the cooperation and participation of all employees of the Company in achieving these objectives.