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## **Pegasus Policy on Equal Employment Opportunity**

Equal Employment Opportunity has been, and will continue to be, a fundamental principle at Pegasus Senior Living, where employment is based upon personal capabilities and qualifications without discrimination because of an individual's race, natural hairstyles, hair wraps (i.e. hair scarf, turban, hijab) hair texture, and protective styles, religion, sex, mental or physical disability, age, national origin, medical condition, genetic information, gender identity, sexual orientation, military status, color, pregnancy (including childbirth or related medical condition) HIV/AIDS status or any other protected characteristic established by federal, state or local law. Except where physical or mental abilities are a bona fide occupational qualification, these protected classes/characteristics are not and will not be considered in any personnel or management decisions.

As used in this policy, genetic information means an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

This non-discrimination policy applies to all terms and conditions of employment including, but not limited to, recruitment, hiring, training, promotion, compensation, benefits, transfers and social and recreational programs. People & Culture has overall responsibility for this policy and maintains reporting and monitoring procedures. It is the responsibility of every supervisor, manager and associate to conscientiously follow this policy.

Discriminatory conduct whether committed by an associate, a vendor, a customer, a resident or any other individual, is strictly prohibited and will not be tolerated. Appropriate disciplinary action, including up to discharge, may be taken against any associate found to be in violation of this policy.

If an associate believes that an incident of discrimination has occurred that is offensive or objectionable, causes discomfort or humiliation, creates a hostile environment, or interferes with job performance or advancement opportunities, he or she is urged to bring the matter promptly to the attention of any supervisor, manager, People & Culture, or the Executive Director. In the event an associate feels uncomfortable dealing directly with his/her supervisor in reporting potential discrimination problems, the associate should report the complaint to a department manager, People & Culture, or the Executive Director.

## **Maintaining an Environment Free from Workplace and Sexual Harassment**

Pegasus Senior Living is committed to providing a work environment that encourages mutual respect and is free of unlawful harassment, discrimination and bias. Pegasus Senior Living's non-discrimination and anti-harassment policy applies to all persons involved in the operation of Pegasus Senior Living and prohibits unlawful discrimination or harassment by any associates of the Pegasus Senior Living, including

leaders and co-workers. The law also prohibits unlawful discrimination or harassment by any associate towards customers, vendors, contractors and persons working or visiting on Pegasus Senior Living's premises and third parties are prohibited from unlawfully discriminating or harassing an associate. Prohibited unlawful discrimination or harassment includes, but is not limited to, the following: any discrimination or harassment or use by anyone in its employ of any derogatory epithet (whether verbal, written or gestural) based on race, including but not limited to natural hairstyles, hair wraps (i.e. hair scarf, turban, hijab) hair texture, and protective styles, color, creed, sex (including pregnancy), religion, marital status, age, national origin or ancestry, physical or mental disability, medical condition, genetic information, gender identity, sexual orientation, military status, or any other consideration made unlawful by federal, state or local laws; or sexual harassment, defined as:

- unwanted sexual advances, or visual, verbal or physical conduct of a sexual nature; or any form of sexually offensive behavior including gender-based harassment of a person of the same sex as the harasser when;
- submission to the conduct is made explicitly or implicitly a term or condition of an individual's employment,
- submission to or rejection of the conduct by an individual is used for employment decisions affecting an individual, or
- such conduct has the purpose or effect of unreasonably interfering with the associate's work performance or creating an intimidating, hostile, or offensive work environment.

*Note, however, that is not considered harassment for members of management to enforce Pegasus Senior Living's policies, job performance, and/or conduct standards in a fair and consistent manner.*

#### **Discrimination/Harassment Complaint Procedure**

If any associate believes that this non-discrimination and anti-harassment policy is being violated, either with respect to him or herself or with respect to another associate, they are strongly encouraged to report that belief immediately, either:

- to the associate's leader (either in writing or personally), or
- to the associate's leader's superior, if the associate believes his or her leader is violating this policy, or
- to the Executive Director, VP of People & Culture, Regional Director of Operations, COO, CEO or President to the Associate Concerns Hotline, a toll-free telephone number answered by HR Professionals at Oasis, a Paychex® Company; the number is (877) 782-9179.