

## **Equal Opportunity and Affirmative Action Program Policy Statement**

The Rockefeller University (the "University") has implemented the following policies and procedures as part of its long-standing commitment to compliance with all applicable equal opportunity and affirmative action requirements. The University's President fully supports the University's equal opportunity and affirmative action policies.

### **Equal Opportunity Policy**

It is the policy of The Rockefeller University to ensure equal employment opportunity without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, pregnancy, veteran status, genetic information, citizenship status or any other basis prohibited by law. The Rockefeller University is committed to equal employment opportunity at all levels of employment, including at the executive level. This policy applies to all employment practices including but not limited to recruitment, hiring, employment, assignment, training, compensation, benefits, demotion or transfer, promotions, disciplinary action and terminations.

The Rockefeller University likewise is committed to maintaining a work environment that is free from any and all forms of unlawful discrimination and harassment. It is therefore The Rockefeller University's policy to prohibit discrimination and harassment against any applicant, employee, vendor or contractor on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, pregnancy, veteran status, genetic information, citizenship status or any other basis prohibited by law. It is also the University's policy to prohibit any and all forms of retaliation against any individual who has complained of harassing or discriminatory conduct, or participated in a University or agency investigation into such complaints. The Rockefeller University also provides reasonable accommodation of disability, religion and pregnancy in accordance with applicable laws.

### **Affirmative Action Policy**

The Rockefeller University is a federal contractor and, as such, the University is committed to taking positive steps to implement the employment-related aspects of its equal opportunity policy. Accordingly, it is The Rockefeller University's policy to take affirmative action to employ, advance in employment, and otherwise treat qualified minorities, women, protected veterans, and individuals with disabilities without regard to their race/ethnicity, sex/sexual orientation/gender identity or expression, veteran status, or physical or mental disability or any other legally protected characteristic. Under this policy, The Rockefeller University also will provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose an undue hardship on the operation of University's business.

The Rockefeller University's affirmative action policy also prohibits employees and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in: (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other federal, state or local law requiring equal opportunity for disabled persons or covered veterans; (3) opposing any act or practice made unlawful by Section

503 or Section 4212 and their implementing regulations, or any other federal, state or local law requiring equal opportunity for disabled persons or covered veterans; or (4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

The non-confidential portions of the full affirmative action program shall be available for inspection upon request by any employee or applicant for employment in the Human Resources Department or by contacting the Vice President of Human Resources and Equal Employment Opportunity Officer at 212-327-8300 Monday through Friday, between the hours of 9:00 a.m. – 5:00 p.m.

### **Application of Equal Opportunity and Affirmative Action Policies**

These policies apply whenever and wherever an employee of The Rockefeller University is performing a function of his or her job, including all Rockefeller locations and Rockefeller-sponsored business and social functions. The Rockefeller University's equal opportunity and affirmative action policies require that employment decisions be based only on valid job requirements, and extend to all terms, conditions, and privileges of employment including, but not limited to, recruitment, selection, compensation, benefits, training, promotion and disciplinary actions.

### **Workplace Harassment, Including Sexual Harassment**

A key component of The Rockefeller University's commitment to equal opportunity is its prohibition of unlawful discriminatory harassment. The University's commitment to equal opportunity and its prohibition of workplace harassment based on a classification protected by law is set forth in the University's non-discrimination and anti-harassment policy. Any employee who suffers or observes harassment or any other violation of this policy is strongly encouraged to notify one of the individuals identified in that policy. The Rockefeller University will promptly and thoroughly investigate alleged misconduct as appropriate and, if a violation of this policy is found, will take immediate and appropriate corrective action.

### **Commitment to Non-Retaliation**

Every employee is encouraged to come forward without fear of reprisal, as The Rockefeller University's equal opportunity and affirmative action policies prohibit any and all forms of retaliation against anyone who in good faith complains that these policies are not being followed, or who otherwise participates in a University or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been subjected to retaliation, your complaint should be directed to one of the individuals identified below.

After receiving a complaint involving a violation of the University's equal opportunity or affirmative action policy, The Rockefeller University will investigate and take corrective action, as appropriate. Complaints and investigations will be kept confidential to the maximum extent possible to the extent consistent with appropriate investigation and corrective action. No one, regardless of position or length of service, is exempt from these policies. Individuals violating The Rockefeller University's policy will be subject to discipline up to and including termination.

### **How to Report a Violation of this Policy**

If you believe that you have been subjected to unlawful discrimination, workplace harassment or retaliation, you can utilize the following resources to address and resolve your concerns:

- Open Door Policy: Our longstanding Open Door Policy encourages employees to discuss any work-related complaint or problem with the management team in your organization.
- Human Resources: Many of your concerns can be addressed by contacting the Department of Human Resources at 212-327-8300.

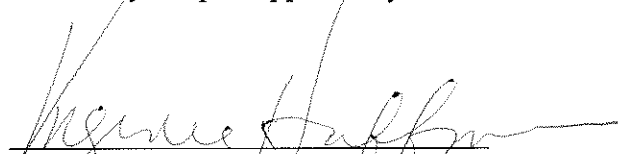
All matters will be promptly investigated and kept confidential to the extent consistent with appropriate investigation and corrective action. Any employee found to be engaging in any form of harassment, unlawful discrimination or retaliation against a person bringing a claim will be subject to disciplinary action up to and including termination.

### **Audit System**

The Rockefeller University has implemented an audit and reporting system to: (1) measure the effectiveness of its affirmative action program; (2) indicate any need for remedial action; (3) determine the degree to which affirmative action obligations have been attained; (4) determine whether all employees, including, without limitation, protected veterans, individuals with disabilities, women, and minorities, have had the opportunity to participate in all University-sponsored educational, training, recreational and social activities; (5) measure compliance with affirmative action obligations; and (6) document the actions taken to comply with affirmative action obligations.

### **Responsibility for Implementation**

As Vice President of Human Resources and Equal Employment Opportunity Officer, I fully support our affirmative action program and am committed to the implementation of the University's equal opportunity and affirmative action policies.



[Virginia Huffman]  
[Vice President of Human Resources]