


Montefiore Einstein

HUMAN RESOURCES POLICY AND PROCEDURE MANUAL	SUBJECT: Conflict Resolution
APPROVED:  DAVID BRODSKY	POLICY NUMBER: VI-5
	PAGES: 1 of 3
	DATE ISSUED: 07/01/09
	DATE REVIEWED/REVISED: 11/08/23

GENERAL POLICY:

In accordance with Medical Center policy and The Joint Commission (TJC) Leadership Standard LD.02.04.01, Montefiore promotes a collegial and cooperative work environment built upon the active resolution of workplace conflicts. Staff utilizing these processes in good faith will be protected from any retaliatory action.

POLICY APPLICABLE TO:

All Associates (including, but not limited to, employed physicians, attending physicians, house staff, students) and vendors, independent contractors, and volunteers.

PROCEDURE:


To ensure the active resolution of workplace conflicts, Montefiore has (A) adopted core values of mutual respect, (B) established clear policies regarding acceptable workplace conduct, and (C) implemented a variety of procedures for the fair and speedy resolution of conflicts. Each of these elements is summarized below:

A. Core Values

As part of the Montefiore Excellence Initiative, Montefiore has adopted seven core values that guide Associates in all workplace situations, including dispute resolution. These core values are:

1. **Respect:** "I honor and value each person."
2. **Effective Communication:** "I listen carefully and keep others well informed."
3. **Sensitivity:** "I demonstrate my willingness and ability to listen and understand others' feelings, needs and circumstances."
4. **Professionalism:** "I demonstrate confidence, competence, and pride in my work and appearance."
5. **Exceeding Expectations:** "I assist others without being asked."
6. **Courtesy:** "I treat everyone with kindness and care."
7. **Teamwork:** "I am a member of the Montefiore Medical Center team. I support and encourage others and focus on our shared goals."

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B. Clear Workplace Conduct Policies

Montefiore has established “bright line” rules regarding behavior that is not acceptable in the workplace. These rules are set forth in the following Human Resource Policies:


1. Management of Disruptive Conduct, HR Policy VI-3, which prohibits threatening, intimidating, or abusive conduct.
2. Non-Discrimination and Anti-Harassment, HR Policy VI-6, which prohibits discriminatory, harassing or retaliatory behavior.
3. Maintaining a Non-Violent Workplace, HR Policy VII-20, which prohibits physically or verbally violent behavior.
4. Medical Center Rules & Regulations, HR Policy VII-1, which lists prohibited activities including fighting, theft, and neglect of duty.

C. Conflict Resolution Procedures

If conflict cannot be resolved informally, Montefiore has adopted several procedures to achieve a resolution in a prompt and fair manner. Associates who participate in these procedures must abide by Montefiore’s core values (listed above), and must adhere to Montefiore’s policies regarding acceptable workplace behavior (also listed above). The conflict resolution procedures are available to specific groups or populations within the Medical Center, and include the following:

1. First, the Human Resources Department will investigate complaints and can offer advice on how to reduce interpersonal conflict. In addition, depending on the circumstances, the Human Resources Department can engage outside experts, such as mediators, to promote more harmonious working relationships.
2. Non-Union Grievance Procedure, HR Policy VI-4, which is available for Associates who are not represented by a union.
3. Collectively Bargaining Grievance Procedures that vary from union to union and which are available to Associates who are represented by a union.
4. The Hearing and Appeal Policy and Procedures for Redress of Adverse Actions and Grievance of Residents, which is available to residents training in programs sponsored by Albert Einstein College of Medicine and New York Medical College.


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5. The Medical Staff by Laws, available to members of the Medical Staff.
6. The Montefiore Workplace Mediation Program serves as a conflict resolution option to Montefiore associates who wish to take advantage of this free and voluntary service currently available at Montefiore's Moses and Wakefield campuses. It is a confidential and informal way to resolve interpersonal disagreements or disputes between people who work together.

All Medical Center Human Resources policies and practices are guidelines and may be changed, modified or discontinued at any time by the Medical Center's Senior Vice President of Human Resources, or designee, with or without notice. Exceptions do not invalidate the basic policy.

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GENERAL POLICY:

Montefiore Medical Center is committed to providing its Associates, patients and visitors with an environment free from discrimination, unlawful harassment (including sexual harassment) and other harassing behavior. Maintaining such an environment is a responsibility shared by all Associates.

This policy applies to conduct both in the workplace and at work-related activities outside of the workplace (for example, an off-site business meeting or a business-related social event occurring after regular working hours). Calls, texts, emails, and social media usage by Associates can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

This policy also applies when Associates are working remotely from home. Harassment can happen on virtual meeting platforms, in messaging apps, and after working hours between personal cell phones.

POLICY APPLICABLE TO:


All Associates (including, but not limited to, employed physicians, attending physicians, house staff, students) and vendors, independent contractors, agency workers, interns (paid and unpaid) and volunteers. This policy also applies to applicants for employment, contractors, subcontractors, consultant, and persons conducting business, regardless of immigration status, with Montefiore. In this document, the term "Associate" refers to this collective group.

PURPOSE and GOALS:

The purpose of this policy is to:

- Foster a work environment characterized by respect, tolerance, and understanding.
- Recognize the strength, talent, and insight Montefiore draws from Associates with diverse views and experiences.
- Guarantee equal employment opportunity that is free from discrimination or harassment on the basis of race; color; religion; creed; national origin; alienage or citizenship status; citizenship or immigration status; age; sex; gender; actual or presumed disability; history of disability; sexual orientation; gender identity or expression; sexual and other reproductive health decisions; genetic predisposition or carrier status; pregnancy; military status or service; familial status; marital or partnership status; arrest or conviction record; caregiver status; credit history; unemployment status; salary history; height or weight; status as victim of domestic violence, sexual violence, or stalking; or any other characteristic protected by law;
- Provide Associates an understanding of their right to a discrimination and harassment free workplace.
- Inform Associates to recognize discrimination, including discrimination due to an Associate's intersecting identities, and provide the tools to take action when it occurs.

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- Describe the procedure for reporting, investigating, and resolving complaints of discrimination, harassment (including sexual harassment), and retaliation.
- All Associates, Managers, and Supervisors are required to work in a manner designed to prevent sexual harassment and discrimination in the workplace. This policy is one component of Montefiore's commitment to a discrimination-free work environment.

NON-DISCRIMINATION:

Montefiore draws strength, talent, and insight from the diverse views and experiences of its Associates. This diversity is a strategic asset to Montefiore because it helps Montefiore recruit and retain the best possible Associates who, in turn, provide patients with the best possible care.

To sustain this diversity, Montefiore will recruit, hire, train, transfer, promote, layoff and discharge Associates in all job classifications without regard to their race, color, religion, creed, national origin, alienage or citizenship status, citizenship or immigration status, age, sex/gender, actual or presumed disability, history of disability, sexual orientation, gender identity or expression, sexual and other reproductive health decisions, genetic predisposition or carrier status, pregnancy, military status or service, familial status, marital or partnership status, arrest or conviction record, caregiver status, credit history, unemployment status, salary history, height or weight, status as victim of domestic violence, sexual violence, or stalking, or any other characteristic protected by law.


Likewise, Montefiore will make human resources and staffing decisions such as setting compensation, establishing work schedules, completing performance appraisals, delivering benefits, assigning tasks, reviewing requests for time off from work, allocating resources, and administering leave of absence and other policies without regard to race, color, religion, creed, national origin, alienage or citizenship status, citizenship or immigration status, age, sex/gender, actual or presumed disability, history of disability, sexual orientation, gender identity or expression, sexual and other reproductive health decisions, genetic predisposition or carrier status, pregnancy, military status or service, familial status, marital or partnership status, arrest or conviction record, caregiver status, credit history, unemployment status, salary history, height or weight, status as victim of domestic violence, sexual violence, or stalking, or any other characteristics protected by law.

In accordance with Human Resources Policy VI-8 concerning the employment of qualified Associates with a disability, Montefiore will provide reasonable accommodations to Associates with disabilities so that they can perform the essential functions of their positions.

Examples of prohibited behavior include:

- Allowing racial, ethnic, sexual, or religious stereotypes or assumptions to influence hiring or promotional decisions, or an appraisal of an individual's performance;
- Refusing to hire, transfer, or promote a qualified individual because of their age;
- Refusing to hire, transfer, or promote a qualified individual because of their religious beliefs or practices;

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- Refusing to hire, transfer, or promote a qualified individual because they are responsible for caring for a child, parent, or a person with a disability;
- Refusing to hire, transfer, or promote a qualified individual because they speak English with an accent, or because English is not their primary language;
- Refusing to hire, transfer, or promote a qualified individual because they are regarded as disabled or has a history of disability;
- Refusing to hire, transfer or promote a qualified individual because of perceived sexual orientation, or stated gender identity or expression;
- Refusing to hire, transfer or promote a qualified individual because of sexual and other reproductive health decisions;
- Refusing to hire, transfer, or promote a qualified individual who is legally authorized to work in the United States because of the nature of their work authorization;
- Refusing to discuss with a disabled individual reasonable accommodations that would enable them to perform the essential functions of their position;
- Refusing to grant an individual a leave of absence to fulfill their military service obligations;
- Prohibiting Associates from conversing in a language other than English during their break periods or when not performing their duties;
- Refusing to hire, transfer, or promote a qualified individual because they may be pregnant, or may become pregnant in the future; or
- Using racial, ethnic, sexual, or religious slurs.

TRAINING:

Montefiore provides annual sexual harassment training for all Associates, including supervisory and managerial employees, as required by New York State and New York City law. Participation in such training is required. Montefiore will take appropriate administrative remedies to ensure compliance.


HARASSMENT:

Any harassing conduct, even a single incident, can be addressed under this policy.

A. Unlawful Harassment:

- Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility to or aversion toward an individual because of their race, color, sex/gender, religion, creed, national origin, alienage or citizenship status, citizenship or immigration status, age, actual or presumed disability, history of disability, sexual orientation, gender identity or expression, sexual and other reproductive health decisions, genetic predisposition or carrier status,

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pregnancy, military status or service, familial status, marital or partnership status, arrest or conviction record, caregiver status, credit history, unemployment status, salary history, height or weight, status as victim of domestic violence, sexual violence, or stalking, or any other characteristics protected by law that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; (iii) subjects an individual to inferior terms, conditions, or privileges of employment; or (iv) otherwise adversely affects an individual's employment opportunities. Harassing conduct may include (but is not limited to):

- Epithets, slurs or negative stereotyping;
- Threatening or intimidating acts;
- Denigrating jokes; or
- Displaying or circulating objects or written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through e-mail, the internet, or the mail).

B. Sexual Harassment:

- Sexual harassment is a form of gender-based discrimination that is unlawful under federal, state, and local law. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity, and the status of being transgender.
- Montefiore is committed to maintaining a workplace free from sexual harassment.
- All Associates are required to work in a manner that prevents sexual harassment in the workplace. All Associates have a legal right to a workplace free from sexual harassment and Associates are urged to report sexual harassment by filing a complaint internally with Montefiore.
- Sexual harassment is unacceptable. Any Associate who engages in sexual harassment, discrimination, or retaliation will be subject to remedial and/or disciplinary action (e.g., counseling, suspension, termination).
- Discrimination of any kind, including sexual harassment, is a violation of Montefiore's policies, is unlawful, and may subject Montefiore to liability for the harm experienced by targets of discrimination. Harassers may also be individually subject to liability and employers or supervisors who fail to report or act on harassment may be liable for aiding and abetting such behavior. Associates at any level who engage in harassment or discrimination, including managers and supervisors who engage in harassment or discrimination or who allow such behavior to continue, will be penalized for such misconduct.
- Montefiore will conduct a prompt and thorough investigation whenever management receives a complaint about sexual harassment, or otherwise knows of possible sexual harassment

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occurring. Montefiore will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All Associates, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment or discrimination.


- All Associates are encouraged to report any harassment or behaviors that violate this policy. Montefiore has created a complaint form for Associates to report sexual harassment and file complaints. That form is available on the Montefiore Intranet in the Human Resources policies page at: Human Resources > Policies and Procedures > HR Policies and Procedures.
- Managers and supervisors are **required** to report any complaint that they receive, or any harassment that they observe or become aware of, to a supervisor, manager, Corporate Compliance, Compliance Hotline, a Human Resources Business Partner, or Employee and Labor Relations.

Sexual harassment is not limited to sexual contact, touching, or expressions of a sexually suggestive nature. Sexual harassment includes all forms of gender discrimination including gender role stereotyping and treating Associates differently because of their gender.

Understanding gender diversity is essential to recognizing sexual harassment because discrimination based on sex stereotypes, gender expression and perceived identity are all forms of sexual harassment. The gender spectrum is nuanced, but the three most common ways people identify are cisgender, transgender, and non-binary. A cisgender person is someone whose gender aligns with the sex they were assigned at birth. Generally, this gender will align with the binary of male or female. A transgender person is someone whose gender is different than the sex they were assigned at birth. A non-binary person does not identify exclusively as a man or a woman. They might identify as both, somewhere in between, or completely outside the gender binary. Some may identify as transgender, but not all do. Respecting an individual's gender identity is a necessary first step in establishing a safe workplace.

Sexual harassment is unlawful when it subjects an individual to inferior terms, conditions, or privileges of employment. Harassment does not need to be severe or pervasive to be illegal. It can be any harassing behavior that rises above petty slights or trivial inconveniences. Whether harassing conduct is considered petty or trivial is to be viewed from the standpoint of a reasonable victim of discrimination with the same protected characteristics. Generally, any behavior in which an Associate is treated worse because of their gender (perceived or actual), sexual orientation, or gender expression is considered a violation of Montefiore's policy. The intent of the behavior, for example, making a joke, does not neutralize a harassment claim. Not intending to harass is not a defense. The impact of the behavior on a person is what counts. Sexual harassment includes any unwelcome conduct which is either directed at an individual because of that individual's gender identity or expression (perceived or actual), or is of a sexual nature when:

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- The purpose or effect of this behavior unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. The impacted person does not need to be the intended target of the sexual harassment;
- Employment depends implicitly or explicitly on accepting such unwelcome behavior; or
- Decisions regarding an individual's employment are based on an individual's acceptance to or rejection of such behavior. Such decisions can include what shifts and how many hours an Associate might work, project assignments, as well as salary and promotion decisions.

There are two main types of sexual harassment:


- Behaviors that contribute to a hostile work environment include, but are not limited to, words, signs, jokes, pranks, intimidation, or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex, gender identity, or gender expression. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory, or discriminatory statements which an Associate finds offensive or objectionable, causes an Associate discomfort or humiliation, or interferes with the Associate's job performance.
- Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions, or privileges of employment. This is also called quid pro quo harassment.

Examples of Sexual Harassment

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited. This list is just a sample of behaviors and should not be considered exhaustive. Any Associate who believes they have experienced or witnessed sexual harassment, even if it does not appear on this list, is encouraged to report it:

- Physical acts of a sexual nature, such as:
 - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another Associate's body, or poking another Associate's body; or
 - Rape, sexual battery, molestation, or attempts to commit these assaults, which may be considered criminal conduct outside the scope of this policy (please contact local law enforcement if you wish to pursue criminal charges).
- Unwanted sexual comments, advances, or propositions, such as:
 - Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion, or other job benefits;
 - This can include sexual advances/pressure placed on an Associate by patients or clients.
 - Subtle or obvious pressure for unwelcome sexual activities; or
 - Repeated requests for dates or romantic gestures, including gift-giving.

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- Sexually oriented gestures, noises, remarks or jokes, or questions and comments about a person's sexuality, sexual experience, or romantic history which create a hostile work environment. This is not limited to interactions in person. Remarks made over virtual platforms and in messaging apps when Associates are working remotely can create a similarly hostile work environment.
- Sex stereotyping, which occurs when someone's conduct or personality traits are judged based on other people's ideas or perceptions about how individuals of a particular sex should act or look:
 - Remarks regarding an Associate's gender expression, such as wearing a garment typically associated with a different gender identity; or
 - Asking Associates to take on traditionally gendered roles, such as asking a woman to serve meeting refreshments when it is not part of, or appropriate to, her job duties.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
 - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials, or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace;
 - This also extends to the virtual or remote workspace and can include having such materials visible in the background of one's home during a virtual meeting.
- Hostile actions taken against an Associate because of that Associate's sex, sexual orientation, gender identity, or gender expression, such as:
 - Interfering with, destroying, or damaging an Associate's workstation, tools or equipment, or otherwise interfering with the Associate's ability to perform the job;
 - Sabotaging an Associate's work;
 - Bullying, yelling, or name-calling;
 - Intentional misuse of an Associate's preferred pronouns; or
 - Creating different expectations for Associate based on their perceived identities:
 - Dress codes that place more emphasis on women's attire;
 - Leaving parents/caregivers out of meetings.

Who Can be a Target of Sexual Harassment:

Sexual harassment can occur between any individuals, regardless of their sex or gender. Harassment does not have to be between members of the opposite sex or gender. Harassers can be anyone in the workplace. A supervisor, a supervisee, or a coworker can all be harassers. Anyone else in the workplace can also be harassers including an independent contractor, contract worker, vendor, client, customer, patient, constituent, or visitor.

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Associates' personal history might impact how they interact with certain behavior. It is important for all Associates to be aware of how words or actions might impact someone with a different experience than their own in the interest of creating a safe and equitable workplace.

RETALIATION IS PROHIBITED:

Retaliation is unlawful and is any action that punishes an individual upon learning of a claim of discrimination or harassment (including sexual harassment), that seeks to discourage an Associate from making a formal complaint or supporting a claim of discrimination or harassment (including sexual harassment), or that punishes those who have come forward. These actions need not be job-related or occur in the workplace to constitute unlawful retaliation. For example, threats of physical violence outside of work hours or disparaging someone on social media would be covered as retaliation under this policy.

Examples of retaliation may include, but are not limited to:


- Demotion, termination, denying accommodations, reduced hours, or the assignment of less desirable shifts;
- Publicly releasing personnel files;
- Labeling an Associate as "difficult" and excluding them from projects to avoid "drama";
- Undermining an individual's immigration status; or
- Reducing work responsibilities, passing over for a promotion, or moving an individual's desk to a less desirable office location.

Consistent with federal, state and local law, this Policy prohibits retaliation including intimidation against any individual who has: (a) made a complaint of discrimination or harassment (including sexual harassment) or retaliation, either internally or with any government agency; (b) testified or assisted in a proceeding involving discrimination or harassment (including sexual harassment) or retaliation under the Human Rights Law or any other anti-discrimination law; (c) opposed discrimination or harassment (including sexual harassment) or retaliation by making a verbal or informal complaint to management, or by simply informing a Supervisor or Manager of suspected harassment; (d) reported that another Associate has been harassed including sexual harassment), discriminated against, or retaliated against; or (e) encouraged a fellow Associate to report discrimination, harassment (including sexual harassment) or retaliation.

Even if the alleged harassment, discrimination, or retaliation does not turn out to rise to the level of a violation of law, the Associate is protected from retaliation if the Associate had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect Associates making intentionally false charges of harassment, discrimination, or retaliation.

Montefiore will not tolerate retaliation against anyone who, in good faith, reports or provides information about discrimination or harassment (including sexual harassment) or retaliation.

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Montefiore will severely discipline any person (including Supervisors and Managers) who engages in retaliation. Such discipline may include (but is not limited to) a suspension without pay or termination.

PROCEDURE

REPORTING AN INCIDENT OF DISCRIMINATION, HARASSMENT (Including SEXUAL HARASSMENT), OR RETALIATION:

Early reporting and intervention are the most effective methods of remedying actual and perceived discrimination, harassment (including sexual harassment), and retaliation. Montefiore cannot prevent or remedy actual and perceived discrimination, harassment (including sexual harassment), and retaliation unless it knows about it. Therefore, Montefiore strongly urges individuals to report promptly their complaints or concerns so that it can take prompt and effective action.

All Associates and non-employees who witness, become aware of, or has been subjected to behavior that may constitute discrimination, harassment (including sexual harassment), or retaliation should report such behavior to a supervisor, manager, Corporate Compliance, Compliance Hotline, a Human Resources Business Partner, or Employee and Labor Relations. Such behavior can be reported in writing or verbally.

A form for submission of a written complaint is accessible on Montefiore's Intranet and available at: Human Resources > Policies and Procedures > HR Policies and Procedures. All Associates are encouraged to use this complaint form when reporting harassment (including sexual harassment). Associates who are reporting harassment on behalf of other Associates should use the complaint form and note that it is on another Associate's behalf.


Individuals who believe they have experienced discrimination, harassment (including sexual harassment) or retaliation can make or report a complaint verbally or in writing to any of the following:

- The individual's immediate Supervisor;
- The administrative or clinical leader of the individual's department;
- A Human Resources Business Partner;
- Employee and Labor Relations Division (which includes: Director of Employee and Labor Relations; Labor Employment Counselor; Employee and Labor Relations Manager);
- Corporate Compliance; or
- Compliance Hotline (1-800-662-8595).

An individual should not feel obligated to make a complaint to their immediate Supervisor first. The individual can complain immediately to any of the persons/office listed above.

This policy does not preclude an individual who believes they experienced discrimination, harassment, or retaliation from promptly advising the offender that their conduct is unwelcome and from requesting that the offender discontinue the objectionable conduct.

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This policy relies, in part, on the good faith of Montefiore's Associates. If an Associate deliberately abuses this policy and files a false or malicious complaint, Montefiore may discipline the Associate. Such discipline may include (but is not limited to) a suspension without pay or discharge.

SUPERVISORS AND MANAGERS MUST REPORT DISCRIMINATION, HARASSMENT OR RETALIATION:

Supervisors and Managers have a special responsibility to make sure Associates feel safe at work and that workplaces are free from harassment and discrimination.

Supervisors and Managers are required, under this Policy and the law, to promptly report to either a Human Resources Business Partner or the Employee and Labor Relations Division of the Human Resources Department, any complaint or information they receive concerning discrimination, harassment or retaliation.

Furthermore, all Supervisors and Managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected sexual harassment to either a Business Partner or the Employee and Labor Relations Division of the Human Resources Department. Supervisors and Managers should not be passive and wait for an associate to make a complaint. If they observe such behavior, they must act and report the situation to either a Business Partner or the Employee and Labor Relations Division of the Human Resources Department.


Supervisors and Managers can be disciplined if they engage in sexually harassing or discriminatory behavior themselves. Supervisors and managers can also be disciplined for failing to report suspected sexual harassment or allowing sexual harassment to continue after they know about it.

BYSTANDER INTERVENTION:

Associates who witness harassment as a bystander are encouraged to report it. Supervisors and Managers that are a bystander to harassment are required to report it. There are five standard methods of bystander intervention that can be used when anyone witnesses harassment or discrimination and wants to help. Though not exhaustive, and dependent on the circumstances, the following can serve as a brief guide of how to react when witnessing harassment in the workplace.

1. A bystander can interrupt the harassment by engaging with the individual being harassed and distracting them from the harassing behavior;
2. A bystander who feels unsafe interrupting on their own can ask a third party to help intervene;
3. A bystander can record or take notes on the harassment incident to benefit a future investigation;
4. A bystander might check in with the person who has been harassed after the incident, see how they are feeling and let them know the behavior was not ok; and
5. If a bystander feels safe, they can confront the harassers and name the behavior as inappropriate. When confronting harassment, physically assaulting an individual is never an appropriate response.

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INVESTIGATION OF COMPLAINTS:

Montefiore will promptly investigate all complaints or information about discrimination, harassment (including sexual harassment), or retaliation, whether that information was reported in verbal or written form.

Depending on the circumstances and the nature of the allegations, a Supervisor in the department where the complaining Associate works, a representative from the Human Resources Department, or an outside party retained by Montefiore may conduct the investigation.

The investigation will be prompt, thorough, fair, impartial and accurate, and will be commenced immediately and completed as soon as possible.

Montefiore will keep confidential the identities of the individuals involved in the investigation (including the person who made the complaint, the person accused of violating this Policy, and the persons interviewed during the investigation) only to the extent feasible to conduct an adequate investigation and take corrective action.

The scope of the investigation depends on the nature of the complaint. Both the person(s) raising the complaint and the person(s) about whom the complaint was made will be permitted to provide information that may be relevant to the investigation. Montefiore also will gather information and speak with witnesses, as applicable. Once the investigation is completed and a determination is made, the complaining party will be advised that the investigation has been completed and may be informed of the resolution. The individual about whom the complaint was made will be informed of the outcome and if it is determined that this policy has been violated, will be subject to disciplinary action.


Any Associate may be required to cooperate as needed in an investigation. Montefiore will not tolerate retaliation against Associates who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

CORRECTIVE ACTION:

Montefiore will address a violation of this policy promptly and effectively. Depending on the circumstances, corrective action by Montefiore may include one or more of the following measures:

- Counseling;
- Training;
- Disciplinary warning or suspension without pay;
- Denial of a promotion or pay increase;
- Reduction in wages;
- Demotion;
- Reassignment;
- Discharge;

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HUMAN RESOURCES POLICY AND PROCEDURE MANUAL	SUBJECT: Non-Discrimination and Anti-Harassment (Including Sexual Harassment)
APPROVED:  DAVID BRODSKY	POLICY NUMBER: VI-6
	PAGES: 12 of 13
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	DATE REVIEWED/REVISED: 11/24/23

- Reporting to professional and/or investigate authorities (such as the Office of Professional Discipline and the Office of Professional Medical Conduct);
- Termination of the relationship with the vendor or independent contractor.

In cases where Montefiore concludes that this policy was not violated but that an Associate engaged in unprofessional or inappropriate conduct, Montefiore may, in its discretion, discipline the Associate (including a suspension without pay or discharge) or reassign them to another Supervisor, department or location.

Legal Protections And External Remedies:

Sexual harassment, discrimination, and retaliation are not only prohibited by Montefiore but are also prohibited by state, federal, and, where applicable, local law (including New York City Law).

Aside from the internal process at Montefiore, Associates may also choose to pursue legal remedies with the following governmental entities, and Associates subjected to unlawful discrimination, harassment or retaliation may be entitled to certain remedies, including monetary damages, civil penalties, and injunctive relief (such as an order that certain action be taken or that certain behavior stop). While a private attorney is not required to file a complaint with a governmental agency, you may seek the legal advice of an attorney.


The New York State Division of Human Rights may be contacted by visiting www.dhr.ny.gov, by telephone at 718-741-8400, or by mail to One Fordham Plaza, Fourth Floor, Bronx, New York 10458. Associates may also call 1-800-427-2773 regarding any complaint of workplace sexual harassment or to submit a complaint regarding such harassment (that number will be staffed by the New York State Division of Human Rights). Information about filing a complaint with DHR can be found at dhr.ny.gov/complaint

The Equal Employment Opportunity Commission has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov

Local Protections

Many localities enforce laws protecting individuals from sexual harassment, discrimination, and retaliation. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, Associates who work in New York City may file complaints of sexual harassment, discrimination, or retaliation with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 22 Reade Street, 1st Floor, New York, New York; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml

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Information regarding federal, state and city courts is also available online.

Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime, and the individual should consider contacting the local police department.

All Medical Center Human Resources policies and practices are guidelines and may be changed, modified or discontinued at any time by the Medical Center's Senior Vice President of Human Resources, or designee, with or without notice. Exceptions do not invalidate the basic policy.

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COMPLAINT FORM

Please provide the requested information so that Montefiore may investigate and resolve your complaint. You are not limited to the space provided and may attach additional pages. Once you have completed this form, please provide a copy of it to a supervisor, manager, Corporate Compliance, Compliance Hotline, a Human Resources Business Partner, or Employee and Labor Relations.

Name _____ Title _____

Email _____ Phone _____

Department/Location _____ Supervisor _____

- A. Complaint(s) – Please describe your complaint(s), including the name of the person(s) about whom you are complaining. If your complaint involves specific comments, please include a description of the comments.

- B. Related Material – Please list, and if possible, provide copies of, any emails, text messages, letters, notes, memos, diary entries, calendars, reports, or other items that relate to your complaint(s):

- C. Persons With Information – Please list the name and contact information of any individuals who you believe may have information about your complaint(s):

- D. Prior Report(s) – Have you previously reported your concerns to anyone else at Montefiore? If yes, please provide the name(s) and position(s) of the person(s) to whom you reported the concerns, whether that was done verbally or in writing, and when that was done.

I understand that if I become aware of additional information that relates to my complaint, I must promptly provide such information to Human Resources. I also am aware that Montefiore prohibits retaliation against me for filing this complaint, and I agree that I will immediately report any incident I believe is retaliatory using Montefiore's procedures for reporting retaliation.


Reporter's Signature

Date completed by Reporter

HR, Manager or Compliance Signature

Date received from Associate

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HUMAN RESOURCES POLICY AND PROCEDURE MANUAL	SUBJECT: Drug and Alcohol Policy
APPROVED:  DAVID BRODSKY	POLICY NUMBER: VII-8
	PAGES: 1 of 3
	DATE ISSUED: 12/7/98
	DATE REVIEWED/REVISED: 11/10/23

GENERAL POLICY:

Montefiore Medical Center prohibits Associates from manufacturing, distributing, dispensing, possessing, or using alcohol, marijuana (recreational or medical), or illegal drugs on Medical Center property. An Associate who engages in such conduct will be discharged. An Associate who reports to work impaired by alcohol, marijuana (recreational or medical), illegal drugs, or controlled substances while on duty will be disciplined, up to and including immediate discharge.

POLICY APPLICABLE TO:

All Associates (including, but not limited to, employed physicians, attending physicians, house staff, students, vendors, independent contractors, and volunteers).

PROCEDURE:


Beer or wine may be served at events sponsored by the Medical Center on Medical Center property only with the approval of a Vice President (or higher). Except in such approved events, Montefiore will immediately discharge an Associate who manufactures, distributes, dispenses, possesses, or uses alcohol on Medical Center property.

Montefiore will immediately discharge an Associate who manufactures, distributes, dispenses, possesses, or uses marijuana (recreational or medical) or illegal drugs on Medical Center property.

If an Associate is behaving in a manner to suggest they are impaired by alcohol, marijuana (recreational or medical), illegal drugs, or controlled substances, a Supervisor should:


- 1) record their observations in a **Fitness for Duty Observation Form** which is available on the intranet on the Human Resources page in the Manager's Toolkit;
- 2) whenever possible, have a second Supervisor observe, confirm, and record the Associate's behavior in a second, separate **Fitness for Duty Observation Form**;
- 3) immediately escort the Associate to the nearest OHS office (during normal weekday business hours, until 4pm) or the Emergency Department (when OHS is closed) to undergo a fitness for duty determination and a toxicology test.
 - a. The Supervisor should inform the Associate that they will undergo a fitness for duty determination and may be asked to undergo a voluntary toxicology test.

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HUMAN RESOURCES POLICY AND PROCEDURE MANUAL	SUBJECT: Drug and Alcohol Policy
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- b. The Supervisor should call ahead to OHS/ED to advise that they will be accompanying an Associate for a fitness for duty determination.
 - c. The Associate should not go to OHS/ED alone. The Associate should be accompanied by a Supervisor at all times.
 - d. If necessary, the Associate and Supervisor should travel to the OHS/ED in a Montefiore vehicle or car.
 - e. If the Associate refuses to go to OHS/ED or follow the instructions of the Supervisor, the Associate should be put off duty, and will be subject to discipline for insubordination, up to and including discharge.
 - f. If the Supervisor feels unsafe or unable to manage the behavior of the Associate, the Supervisor should immediately call Montefiore Security. At locations where Montefiore Security is not immediately available or to which Montefiore Security is not assigned, the Supervisor should call the local police.
- 4) Upon arrival at OHS/ED with the Associate, the Supervisor should submit the **Fitness for Duty Observation Forms** to OHS/ED. The Supervisor should retain a copy of this form for their records.
 - 5) OHS/ED will conduct a fitness for duty evaluation.
 - a. OHS/ED, in its sole discretion, may request the Associate to submit to a toxicology test to determine whether the Associate is impaired by alcohol, marijuana (recreational or medical), illegal drugs, or controlled substances.
 - i. If the Associate refuses such test, the Medical Center shall determine whether the Associate was fit for duty and whether they were impaired by alcohol, marijuana (recreational or medical), illegal drugs, or controlled substances on the basis of the Supervisor(s)'s observations and the conclusions of OHS/ED.
 - ii. An Associate who undergoes a toxicology test will not be permitted to return to duty until the test results are received and reviewed by OHS/ED.
 - b. OHS/ED will determine whether the Associate is impaired by alcohol, marijuana (recreational or medical), illegal drugs, or controlled substances, and will determine whether the Associate is fit for duty.

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- c. OHS/ED will notify the Supervisor who escorted the Associate to the evaluation whether the Associate is fit for duty and whether the Associate should be placed off duty.
- d. OHS/ED will notify the Supervisor and Employee and Labor Relations in all cases:
 - i. whether the employee was fit for duty (and the basis for such conclusion).
 - ii. whether the employee was at the time of the evaluation impaired by alcohol, marijuana (recreational or medical), illegal drugs, or controlled substances (and the basis for such conclusion).
- 6) An Associate who is impaired by alcohol, marijuana (recreational or medical), illegal drugs, or controlled substances on Medical Center property may be disciplined, up to and including immediate discharge for the first occurrence.
- 7) In all cases, the Associate will be placed off duty, without pay, pending investigation, and the Supervisor will consult with the Employee and Labor Relations Department representative.
- 8) If an Associate refuse to submit to drug and alcohol testing in the Montefiore ED or OHS, Montefiore will rely on the Supervisor's observation and other factors and assume the Associate was impaired and take appropriate disciplinary action, up to and including discharge.

If a vendor, independent contractor, agency worker or volunteer is behaving in a manner to suggest they are impaired by alcohol, marijuana (recreational or medical), illegal drugs, or controlled substances, a supervisor should follow steps 1 and 2 above and retain the Fitness for Duty Observation Form in the department's records and

- (a) Request that the individual leave Montefiore Medical Center premises and
- (b) Notify the organization responsible for the individual's role at Montefiore Medical Center, ie. vendor, employment agency, etc.

All Medical Center Human Resources Policies and practices are guidelines and may be changed, modified or discontinued any time by the Medical Center's Senior Vice President of Human Resources, or designee, with or without notice. Exceptions do not invalidate the basic policy.

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HUMAN RESOURCES POLICY AND PROCEDURE MANUAL	SUBJECT: Workplace Accommodations for Religious Beliefs
APPROVED:  DAVID BRODSKY	POLICY NUMBER: VII-16
	PAGES: 1 of 3
	DATE ISSUED: 06/01/97
	DATE REVIEWED/REVISED: 11/10/2023

GENERAL POLICY:

Montefiore Medical Center is fully committed to supporting the religious diversity and needs of its Associates and complies with federal law and applicable state and local laws (including the New York City Human Rights Law). As part of this commitment, Montefiore will reasonably accommodate the religious needs and practices of its Associates unless the accommodation would create an undue hardship on Montefiore.


POLICY APPLICABLE TO:

All Associates (including, but not limited to, employed physicians, attending physicians, house staff, students, and volunteers) and vendors, independent contractors, and agency workers. This policy also applies to applicants.

PROCEDURE FOR REQUESTING AN ACCOMMODATION AND RESPONDING IN WRITING TO ASSOCIATE:


- Religious accommodation requests must be in writing and directed to the Associate's immediate Supervisor. If an Associate is not comfortable making this request to their Supervisor, the Associate may contact Employee and Labor Relations or the head of their department for an accommodation.
- Applicants or Associates who seek a religious accommodation must make the recruiter/interviewer or Supervisor aware of the need for the accommodation and that it is being requested due to a conflict between religion and work.
- Religious accommodations may include, but are not limited to:
 - Time off to observe the Sabbath or holy days.
 - Exemptions from performing a medical procedure.
 - Shift or scheduling changes to accommodate daily prayers.
 - Exceptions to dress and grooming policies and practices.
- Montefiore will only accommodate those beliefs that are religious and sincerely held.
- Montefiore will grant the specific accommodation requested, such as time off to observe the Sabbath, or an alternative accommodation, in accordance with and as limited by the provisions set forth in this policy and provided the accommodation does not create an undue hardship on the department.

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HUMAN RESOURCES POLICY AND PROCEDURE MANUAL	SUBJECT: Workplace Accommodations for Religious Beliefs
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- Montefiore will engage in a written or oral dialogue with an Associate who has requested an accommodation, as well as with any Associate who Montefiore has notice may require a reasonable accommodation for their religion, concerning the Associate's accommodation needs; potential accommodations that may address the Associate's accommodation needs, including alternatives to a requested accommodation; and the difficulties that such potential accommodations may pose for Montefiore.
- The Associate's Supervisor will consult with Employee and Labor Relations in determining whether to grant the accommodation or propose an alternative one.
- If Montefiore is unable to grant the Associate's preferred accommodation, but provides an alternative accommodation, the Associate must cooperate by attempting to meet their religious needs through the proposed accommodation, unless not possible.
- Flexibility and cooperation are key to the search for a reasonable accommodation. Montefiore encourages the Associate to engage in an open and interactive dialogue (the New York City Human Rights Law calls this process the "cooperative dialogue") with their Supervisor and/or Employee and Labor Relations to determine what accommodations might be effective.
- If an Associate identifies an aspect of patient care or service which conflicts with their religious beliefs, the Associate will be exempt from performing that duty related to the patient care or service, provided it does not create an undue hardship on the department or compromise patient care.
- If an emergency situation involving patient care prevents the accommodation at a particular time, the Associate will be expected to perform the assigned duties to avoid compromising patient care. If the Associate does not agree to deliver the requisite care or service in an emergency, they will be subject to discipline, up to and including termination of employment.
- Before granting accommodation requests, Montefiore may request additional information reasonably needed to evaluate the request for an accommodation. For example, if an Associate has requested a schedule change to accommodate daily prayers, the employer may need to ask for information about the religious observance, such as time and duration of the daily prayers, in order to determine whether accommodation can be granted without posing an undue hardship on the operation of the department.
- If Montefiore has a bona fide reason to doubt the validity of the accommodation request (e.g. the Associate has behaved in a manner markedly inconsistent with the professed belief or the timing of the request renders accommodation suspect), Montefiore may require more

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information about the Associate's religious belief or practice that gives rise to the need for the accommodation.

- Decisions regarding requests for religious accommodations are to be made by the immediate Supervisor at the departmental level in consultation with Employee and Labor Relations.
- Employee and Labor Relations must approve any denial of a request for accommodation.
- At the conclusion of the cooperative dialogue process, Associates will be notified in writing in a Grant or Denial of Reasonable Accommodation Request Form whether the request for an accommodation has been granted, denied, or an alternative accommodation will be provided. Human Resources or the Associate's Manager will complete the Grant or Denial of Reasonable Accommodation Request Form. The Associate is to sign the form to indicate receipt of the form and a copy kept in the Associate's departmental file. The template Grant or Denial of Reasonable Accommodation Request Form is available on the Montefiore Intranet.
- Associates disagreeing with the decision, including any proposed alternative accommodations, should consult with Employee and Labor Relations.
- Montefiore prohibits retaliation against any individual who requests an accommodation under this policy. Montefiore will discipline any person who engages in retaliation.

See also Human Resources Policy VI-6: Non-Discrimination & Anti-Harassment

All Medical Center Human Resources policies and practices are guidelines and may be changed, modified or discontinued at any time by the Medical Center's Senior Vice President of Human Resources, or designee, with or without notice. Exceptions do not invalidate the basic policy.

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HUMAN RESOURCES POLICY AND PROCEDURE MANUAL	SUBJECT: Taping/Eavesdropping on Conversations
APPROVED:  DAVID BRODSKY	POLICY NUMBER: VII-17
	PAGES: 1 of 2
	DATE ISSUED: 12/3/2010
	DATE REVIEWED/ REVISED: 11/10/23

GENERAL POLICY:

It is the policy of Montefiore Medical Center (the “Medical Center”) to encourage open communications among its Associates and respect the privacy of Associates, patients and visitors. To facilitate such open communications, and to prevent the chilling effect that may occur if Associates, including Supervisors and Managers, are permitted to secretly tape or otherwise surreptitiously record or listen in on any conversation or communication, the Medical Center has instituted the following policy.

POLICY APPLICABLE TO:

All Associates (including, but not limited to, employed physicians, attending physicians, house staff, students) and vendors, independent contractors, agency workers and volunteers.


PROCEDURE:

Without the prior authorization of either the senior vice president of operations, the senior leader of Marketing, Public Affairs, Learning and Education, or Labor and Employee Relations, Medical Center Associates, voluntary physicians, Managers (or others with supervisory responsibilities), independent contractors and agency workers are prohibited from taping or recording on any Medical Center facility, or at any off-site Medical Center event, any conversation, communications or activity of: (a) patients receiving care at any Medical Center facility (or their family members), (b) Associates who are on duty (unless they have consented to the taping or recording), (c) or any other individual at a Medical Center facility with whom the Medical Center is doing business (for example, vendors, suppliers, consultants, attorneys, independent contractors). Taping or recording Medical Center Associates (without prior consent), independent contractors, or any other individuals when they are on duty or are conducting business on behalf of the Medical Center is prohibited, regardless of where the business takes place, i.e. on or off the Medical Center’s premises.

“Taping” and “Recording” under this policy includes the taping or recording of any conversation or communication, regardless of whether the conversation or communication is taking place in person, over the telephone, and regardless of the method used to tape or record (e.g., a tape recorder, video recorder, cellular phone, mechanical recording, or wiretapping equipment).

This policy shall not prohibit the Medical Center from using surveillance cameras to maintain security at the Medical Center or any of its facilities. This policy should be read in concert with federal, state and local law (including the National Labor Relations Act) and does not abridge any right afforded to an Associate under such laws.

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Violations of this policy may result in disciplinary action against the offending Associate(s), up to and including termination of employment. Where the conduct engaged in is unlawful, violators may also be subject to prosecution under applicable federal, state, or local laws.

If any Associate has any questions or concerns regarding whether any contemplated taping or recording would violate this policy, they should discuss the matter with the Assistant Vice President of Labor and Employee Relations before engaging in any such activities.

CROSS REFERENCE: JP23.1, Photographing, Videotaping, Audiotaping and/or Filming of MMC Patients

All Medical Center Human Resources policies and practices are guidelines and may be changed, modified or discontinued at any time by the Medical Center's Senior Vice President of Human Resources, or designee, with or without notice. Exceptions do not invalidate the basic policy.

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“Taping” and “Recording” under this policy includes the taping or recording of any conversation or communication, regardless of whether the conversation or communication is taking place in person, over the telephone, and regardless of the method used to tape or record (e.g., a tape recorder, video recorder, cellular phone, mechanical recording, or wiretapping equipment).

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HUMAN RESOURCES POLICY AND PROCEDURE MANUAL	SUBJECT: Social Media Policy
APPROVED: DAVID BRODSKY 	POLICY NUMBER: VII-18
	PAGES: 1 of 3
	DATE ISSUED: 03/31/2010
	DATE OF REVIEWED/REVISED: 11/24/23

GENERAL POLICY:

Social media is a positive manner of communicating with current and prospective associates, physicians, patients and our partners in the healthcare community through new online channels.

Montefiore's Marketing Department is responsible for developing and managing all official Montefiore social networking sites, groups, fan pages or other tools representing the organization at large. Associates wanting to develop additional subgroups/sites representing specific staff or departments at Montefiore must notify and receive approval from the Marketing Department prior to development. Montefiore reserves the right to request such sites to link to officially-sanctioned institutional sites or to request removal or changes to subgroups/sites.

The purpose of this policy is to ensure that associates exercise good judgment before posting any information about Montefiore, its services and staff on the web. Montefiore's legitimate interests can, in certain circumstances, be compromised by inappropriate uses of media. Accordingly, this policy is intended to respect employees' rights to personal expression while limiting Montefiore's legal liability and protecting Montefiore's proprietary information and business interests.

For purposes of this policy, social media includes all aspects of internal and external social media and social networking tools and channels, such as blogs, Wikis, Facebook, LinkedIn, Twitter, social video (such as YouTube), photography sharing sites (such as Flickr), etc.

POLICY APPLICABLE TO:

All Associates, including agency staff, and pertains to their use of social media whether:


- on or off Montefiore time;
- on or off Montefiore's premises; and
- it is performed on Montefiore's equipment (computers, smart phones, etc.) or on the associate's own equipment.

PROCEDURE:

Before associates make any posting that identifies them as an associate of Montefiore or that refers to Montefiore, associates must consider the following;

- Associates must exercise sound discretion when engaging in social networking with current or former patients of Montefiore. Engaging in any discussion or posting any information concerning patients', including associate-patients', medical condition could constitute a HIPAA


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violation. Blogs/posts containing photographs or information revealing any protected health information, including the identity of Montefiore patients, is strictly prohibited.

- When engaging in any social networking with former or current patients, associates must abide by all applicable codes of conduct and or ethics associated with their profession, certification or license and any restrictions concerning associate-patient relationships and or communications.
- Blogs/posts may not contain any content that:
 - violates any laws pertaining to the privacy of patients or associates;
 - violates any laws, including laws pertaining to intellectual property;
 - is defamatory or libelous or might be construed as harassment or discrimination on the basis of race; color; religion; creed; national origin; alienage or citizenship status; citizenship or immigration status; age; sex; gender; actual or presumed disability; history of disability; sexual orientation; gender identity or expression; sexual and other reproductive health decisions; genetic predisposition or carrier status; pregnancy; military status or service; familial status; marital or partnership status; arrest or conviction record; caregiver status; credit history; unemployment status; salary history; height or weight; status as victim of domestic violence, sexual violence, or stalking; or any other characteristic protected by law;
 - impersonates other associates;
 - infringes upon any third party rights (including intellectual property rights);
 - discloses any trade secrets, copy right material, or other confidential or proprietary information; or
 - violates Montefiore's workplace policies, including policies against discrimination, harassment, workplace violence, or HIPAA violations.
- The following are permitted only with the express or prior written permission of Montefiore's Legal Department and or Marketing:
 - Blogs/posts that imply sponsorship, endorsement, or support by Montefiore;
 - Blogs/posts that hold the associate out as a spokesperson on behalf of Montefiore; and

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-Blogs/posts that use any Montefiore logo, trademark, or copyright material in violation of laws protecting trademark and copyright.

- Social media networks can link an Associate to Montefiore and other professional organizations. Additionally, people may connect an Associate's own private account with the fact that they work for Montefiore. Posts made under an Associate's own private account may, in certain circumstances, compromise Montefiore and violate Montefiore's Social Media Policy and Non-Discrimination and Anti-Harassment Policy. In such a case, the Associate would be subject to discipline, up to and including termination of employment.
- Montefiore also reserves the right to take any legal action that may be necessary to protect patient privacy and Montefiore registered trademarks, service marks, and proprietary or confidential information.
- Improper personal use of Montefiore computers is prohibited. Montefiore may access or monitor communications stored on its property or in its system, with or without advance notice, to ensure proper use of its equipment and detect security violations.

If there is any uncertainty concerning the content of the posting or if an associate needs clarification of any aspect of this policy, the associate should consult their supervisor or the Human Resources Department before posting.

Nothing herein is intended to limit an Associate's rights under Section 7 of the National Labor Relations Act or prevent an Associate from assisting coworkers or former coworkers with workplace issues concerning Montefiore, and from communicating with others, including about the terms and conditions of employment.

Failure to comply with this policy may lead to discipline up to and including termination.

All Medical Center Human Resources Policies and practices are guidelines and may be changed, modified or discounted at any time any time by the Medical Center's Senior Vice President of Human Resources, or designee, with or without notice. Exceptions do not invalidate the basic policy.