

B. Employment

1. Equal Employment Opportunity (EEO)

The Clinic provides equal employment opportunity without regard to race, color, sex, religion, national origin, age, or disability. The Clinic conforms with all applicable federal and state laws, rules, guidelines, and regulations and provides equal employment opportunity in all employment and employee relations.

The Clinic assures that all applicants for employment and all the Clinic employees are given equal consideration based solely on job-related factors, such as qualifications, experience, performance, and availability. Such equal consideration applies to all personnel actions, including but not limited to recruitment, selection, appointment, job assignment, training, transfer, promotion, merit increases, demotion, termination, pay rates, and fringe benefits. The Clinic reviews, evaluates, and monitors all personnel matters to ensure that they are in accordance with this policy.

The Clinic takes seriously and will investigate promptly and thoroughly all charges of alleged discrimination in employment, and informs the Clinic employees of their rights in regard to equal employment. EEO-related complaints may be made to management.

The Clinic requires its personnel to act in conformity with the principles outlined in this policy through strict adherence to the above statements and recognizes that the effective application of equal opportunity in employment must involve more than a nondiscriminatory policy statement. The Clinic recruits, hires, trains, and promotes into all job levels the most qualified persons without regard to race, color, religion, sex, national origin, age, or disability status. The Clinic takes positive steps to eliminate any discrimination from its personnel practices, and creates an environment that encourages equal opportunity for all of its employees.

2. Hiring of Relatives

Although the Clinic has no prohibition against hiring relatives of existing employees, we are committed to monitoring situations in which relatives work in the same area. In case of actual or potential problems, the Clinic will take prompt action. This can include reassignment or, if necessary, termination of employment for one or both of the individuals involved.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

3. Intra-Office Dating

Although the Clinic has no prohibition against employees dating each other, we are committed to monitoring situations in which people who are dating each other work together. In case of actual or potential problems, the Clinic will take prompt action. This

can include reassignment or, if necessary, termination of employment for one or both of the individuals involved.

4. Immigration Law Compliance

The Clinic is committed to employing only United States citizens and aliens who are authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin.

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form.

Employees with questions or seeking more information on immigration law issues are encouraged to contact the Practice Manager. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

5. Conflicts of Interest

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which the Clinic wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Practice Manager for more information or questions about conflicts of interest.

Transactions with outside firms must be conducted within a framework established and controlled by the Owner of the Clinic. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, employee, or both. Promotional plans that could be interpreted to involve unusual gain require specific Owner approval.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of the Clinic's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of the Clinic as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which the Clinic does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving the Clinic.

6. Outside Employment

Employees may hold outside jobs as long as they meet the performance standards of their job with the Clinic. All employees will be judged by the same performance standards and will be subject to the Clinic's scheduling demands, regardless of any existing outside work requirements.

If the Clinic determines that an employee's outside work interferes with performance or the ability to meet the requirements of the Clinic as they are modified from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain with the Clinic.

Outside employment that constitutes a conflict of interest is prohibited. Employees may not receive any income or material gain from individuals outside the Clinic for services rendered while performing their jobs.

7. Nondisclosure

The protection of confidential business information and trade secrets is vital to the interests and the success of the Clinic. Such confidential information includes, but is not limited to the following examples:

- Compensation data, including pay wages and any bonuses
- Client lists
- Client preferences
- Financial information
- Labor relations strategies
- Marketing strategies
- Technological data

All employees may be required to sign a nondisclosure agreement as a condition of employment. Employees who improperly use disclosed trade secrets or confidential business information will be subject to disciplinary action, up to and including discharge from employment and legal action, even if they do not actually benefit from the disclosed information.