

## WPS Health Solutions Equal Employment Opportunity/Affirmative Action Policy

### Purpose

The Wisconsin Physicians Service Insurance Corporation and its wholly owned subsidiaries, The EPIC Life Insurance Company (EPIC), and WPS Health Plan, Inc. (Arise Health Plan) (collectively, “WPS Health Solutions”), believe in and practice equal employment opportunity and affirmative action. The President of WPS Health Solutions and all management personnel support this Equal Employment Opportunity/Affirmative Action Policy. The President of WPS Health Solutions has assigned the Director, HR Business Partners and Labor Relations to serve as WPS Health Solutions’ Equal Employment Opportunity/Affirmative Action Policy Coordinator, who has overall responsibility for assuring compliance with this Policy. All employees are responsible for supporting the concept of equal employment opportunity and affirmative action and assisting WPS Health Solutions in meeting its objectives.

### Scope

This Policy applies to all WPS Health Solutions employees.

### Definitions

<b>Term</b>	<b>Definition</b>
Protected Characteristic	Characteristic protected from employment discrimination by applicable Federal, state and local laws, including, but not limited to, sex, gender identity, sexual orientation, race, religion, color, national origin or ancestry, veteran status, age, and disability.
Protected Veterans	Veterans protected by the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002, 38 U.S.C. § 4212 (VEVRAA).
Individuals With Disabilities	This term is defined by applicable federal, state and/or local law.

### Corporate Policy Statements

- WPS Health Solutions is committed to a policy of equal opportunity for all employees and applicants. WPS seeks to employ the most qualified person in every position. WPS will not discriminate against, nor give preference to, any person based on a Protected Characteristic. All employment decisions, including, but not limited to, recruitment, hiring, training, promotions, benefits, compensation, transfers, discipline, termination, and any other term, condition, or privilege of employment are based solely on valid job requirements. WPS Health Solutions complies with applicable federal, state and local laws governing non-discrimination in employment and affirmative action in every location in which WPS Health Solutions facilities or employees are located.
- WPS Health Solutions 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 WPS Health Solutions, or
- (c) consistent with WPS Health Solutions' legal duty to furnish information.

- WPS Health Solutions invites all employees and applicants for employment who believe they are covered by VEVRAA and/or Section 503 of the Rehabilitation Act of 1973, as amended (Section 503), to voluntarily identify themselves as Protected Veterans and Individuals with Disabilities during the pre- and post-offer stage of employment, and at any time during their employment, to the Human Resources Department. The information requested is voluntary and will be kept confidential. Refusal to provide the information will not subject the employee or applicant for employment to any adverse treatment and will be used only in accordance with the procedures set forth in the WPS Health Solutions' Affirmative Action Plans.
- Employees and applicants for employment shall not be subjected to harassment, intimidation, threats, coercion, or retaliation because they have engaged in or may engage in any of the following activities:
  - (a) filing a complaint;
  - (b) assisting or participating in an investigation regarding alleged discrimination or harassment as prohibited in this Policy;
  - (c) filing a complaint or assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of VEVRAA, Section 503, or any federal, state or local law;
  - (d) opposing any act or practice made unlawful by VEVRAA, Section 503, or any other federal, state or local law requiring equal opportunities for Individuals with Disabilities or Protected Veterans;
  - or
  - (e) exercising any other right protected by VEVRAA, Section 503, or any other federal, state or local law.
- Any individual concerned about a violation of this Policy should report it to any of the following: the individual's immediate supervisor; another individual in management; Human Resources management; a compliance officer; or the EthicsPoint Hotline ([www.ethicspoint.com](http://www.ethicspoint.com) or 1-866-293-2391). WPS Health Solutions will address any questions or concerns and, if necessary, promptly investigate any complaints under this Policy. The information provided by employees will only be shared on a "need-to-know" basis.
- WPS Health Solutions maintains Affirmative Action Plans for minorities, women, Individuals with Disabilities, and Protected Veterans. Upon request, WPS Health Solutions will provide individuals the opportunity to review the Affirmative Action Plans during normal business hours, as required by applicable law. If you have any questions regarding these Plans, or if you would like to make arrangements to review the Plans, please contact the HR Compliance Manager at 608-977-7022.
- An employee who fails to comply with this Policy is subject to appropriate disciplinary action, up to and including termination of employment.

Approved By: Michael F. Hamerlik  
Title: President and CEO  
Effective Date: March 2010  
Last Revised Date: February 9, 2018