

AFFIRMATIVE ACTION PLAN AND PROGRAM FOR  
QUALIFIED INDIVIDUALS WITH DISABILITIES

It is the policy and practice of The Hospitals of Providence to assure equal opportunity for all employees and applicants for employment, with proper regard to their ability (with or without reasonable accommodation) to satisfy the standards applicable to the job or position involved. The Hospitals of Providence will recruit, hire, train, and promote persons in all job titles, and ensure that all personnel actions are administered without discrimination or regard to non-disqualifying disability, and will ensure that all employment decisions are based only on valid job requirements. An individual is considered to be disabled when he/she has a physical or mental impairment which substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment. The term "qualified individual with a disability," in turn means an individual with a disability who satisfies the requisite skill, experience, education, and other job-related requirements of the employment position such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of such position.

It is also the policy of The Hospitals of Providence that no employee shall be subjected to harassment, intimidation, threats, coercion or discrimination because they engage in any of the following activities: (1) filing a complaint, (2) assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973 or any other federal, state or local law requiring equal opportunity for individuals with disabilities, (3) opposing any act or practice made unlawful by Section 503 or any other federal, state or local law requiring equal opportunity for individuals with disabilities, or (4) exercising any other right protected by Section 503 or its implementing regulations.

While the foregoing Policy is a recognized one of The Hospitals of Providence, this policy and any statements made in connection with it do not create any contracts of employment, either express or implied, nor do they create any legal rights or causes of action.

The purpose of this policy, therefore, is to establish a written plan to assure affirmative action to employ, advance in employment, and otherwise treat qualified individuals with disabilities without discrimination, based upon their physical or mental disabilities. To this end, the Company will establish an internal audit and reporting system to monitor the effectiveness of its affirmative action efforts.