

2023 NOTICE REGARDING COMPANY WELLNESS PROGRAM

Our company provides its employees with a voluntary wellness program that is available to all employees. The program is administered by our wellness provider – TargetCare, according to federal rules permitting employer-sponsored wellness programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990, the Genetic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act, as applicable, among others.

Collection of Health Information

If you choose to participate in the voluntary wellness program you will be asked to complete a Clinical Health Assessment (“CHA”) which consists of health questionnaire that asks a series of questions about your health-related activities and behaviors and whether you have or had certain health conditions (e.g., cancer, diabetes, or heart disease). You will also be asked to complete a biometric screening, which will include blood tests to screen for cholesterol, blood sugar, electrolytes, hydration levels, kidney and liver function, etc. This type of blood analysis is like that performed at a standard physician checkup, and the results will be shared with you. Also, the CHA includes other physical measurements that will be performed at the time of the screening such as blood pressure, resting pulse, waist circumference, height and weight.

The results from your CHA will be used to provide you with information to help you understand your current health and potential risks, and may also be used to offer you services provided by TargetCare such as access to a health coach or onsite health center, at no charge to you. You are also encouraged to share your results or concerns with your own doctor.

Voluntary Program and Incentive

You are not required to complete the Clinical Health Assessment or other components of the wellness program; however, employees who choose to participate in the wellness program will receive an incentive for their participation. Although not required, only employees who participate will receive the incentive. Additional incentives may be available for employees who participate in certain health-related activities or achieve certain health outcomes. If you are unable to participate in any of the health-related activities or achieve any of the health outcomes required to earn an incentive, you may be entitled to a reasonable alternative standard. You may request a reasonable accommodation or an alternate standard by contacting your Human Resources Department.

Protections from Disclosure of Health Information

We are required by law to maintain the privacy and security of your personally identifiable health information. That is why our company has chosen to work with a wellness provider – TargetCare. TargetCare shares aggregate information with our company to let us know about health trends in our organization. TargetCare will never disclose any of your personal information either publicly or to us, except as necessary to respond to administer the incentive program or to respond to a request from you for a reasonable accommodation, or as expressly permitted by law. Health information that personally identifies you that is provided in connection with the wellness program will not be provided to your supervisors or managers and may never be used to make decisions regarding your employment.

Your health information will not be sold, exchanged, transferred, or otherwise disclosed except to the extent permitted by law to carry out specific activities related to the wellness program, and you will not be asked or required to waive the confidentiality of your health information as a condition of participating in the wellness program or receiving an incentive. Anyone who receives your information for purposes of providing you services as part of the wellness program will abide by the same confidentiality requirements. The only individual(s) who will receive your personally identifiable health information are those who work for TargetCare or need the information to administer the wellness incentive program.

In addition, all health information obtained through the wellness program will be maintained separate from your personnel records, information stored electronically will be encrypted, and no information you provide as part of the wellness program will be used in making any employment decision.

You may not be discriminated against in employment because of the health information you provide as part of participating in the wellness program, nor may you be subjected to retaliation if you choose not to participate. If you have questions or concerns regarding this notice, please contact your Human Resources Department.