



Individuals With Disabilities

POLICY STATEMENT

Woodard & Curran is committed to complying with all applicable provisions of the Americans With Disabilities Act ("ADA"), Section 503 of the Rehabilitation Act, and all applicable state and local laws prohibiting discrimination against qualified individuals with disabilities. It is Woodard & Curran's policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job with or without reasonable accommodation. Consistent with this policy of nondiscrimination, Woodard & Curran will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA and Section 503 of the Rehabilitation Act, who has made Woodard & Curran aware of his or her disability, provided that such accommodation does not constitute an undue hardship on Woodard & Curran.

Employees and applicants with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact a representative from Human Resources. Woodard & Curran encourages individuals with disabilities to come forward and request reasonable accommodation.

PROCEDURE FOR REQUESTING AN ACCOMMODATION

Applicants needing assistance with the job application process may send an email to hr@woodardcurran.com with the subject header "Request for Aid with Job Application Process".

An accommodation request may be made to either the individual's Manager or a representative from the Human Resources department. On receipt of an accommodation request, the Human Resources representative and the individual's Manager meet with the individual to discuss and identify the precise limitations resulting from the disability and the potential accommodation that Woodard & Curran might make to help overcome those limitations.

Woodard & Curran will determine the feasibility of the requested accommodation considering various factors, including, but not limited to the nature and cost of the accommodation, the availability of tax credits and deductions, outside funding, Woodard & Curran's overall financial resources, the accommodation's impact on the operation of Woodard & Curran, including its impact on the ability of other employees to perform their duties and on Woodard & Curran's ability to conduct business.

The Genetic Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting, or requiring, genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, employees are not to provide any genetic information in the request for a disability accommodation. "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

All employees are required to comply with safety standards. Applicants who pose a direct threat to the health or safety of other individuals in the workplace, which threat cannot be eliminated by reasonable accommodation, will not be hired. Current employees who pose a direct threat to the health and safety of the other individuals in the workplace will be placed on appropriate leave until an organizational decision has been made in regard to the employee's immediate employment situation.



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Woodard & Curran will inform employees and applicants of decisions on accommodation requests or on how to make the accommodation. If the accommodation request is denied, employees and applicants will be advised of their right to appeal the decision by submitting a written statement explaining the reasons for the request. If the request on appeal is denied, that decision is final.

The ADA and Section 503 of the Rehabilitation Act do not require Woodard & Curran to make the best possible accommodation, to reallocate essential job functions, or to provide personal use items (i.e., eyeglasses, hearing aids, wheelchairs, etc.).

An employee or job applicant who has questions regarding this policy or believes that he or she has been discriminated against based on a disability should notify Human Resources. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

DEFINITIONS

In implementing this policy, Woodard & Curran will be guided by the then-applicable definitions stated in the federal laws or in case law construing the federal laws, and applicable state and local law. In the event of any conflict between the definitions in the federal laws and the definitions in this policy, the legal definitions will control. The following discussion is provided for general guidance of employees and applicants in understanding the policy of the Company.

- “Disability” refers to a physical or mental impairment that substantially limits one or more of the major life activities of an individual. An individual who has such an impairment, or has a record of such an impairment is also deemed a “disabled individual”. An individual may also be deemed “disabled” if that person is regarded as having such an impairment. However, in the “regarded as” instance, the situation is more complicated. Under amendments to the ADA in 2008, if the condition is transitory and minor, defined as having an actual or expected duration of 6 months or less, then the condition does not qualify as a disability.
- Generally, ameliorative measures such as medications and medical devices will not be considered in making a disability determination, although ordinary eyeglasses may be taken into consideration. So, for example, the mere fact that a person wears ordinary eyeglasses will not qualify that person as “disabled.” On the other hand, the fact that a person has a hearing aid or takes medications to address the impairment will not disqualify that person as being “disabled” if the person otherwise meets the definition of “disabled.”
- “Major life activity” may include things such as caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating or working. A “major life activity” may also include bodily functions such as functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive systems.
- “Direct threat to safety” refers to a significant risk to the health or safety of others that cannot be eliminated by reasonable accommodation.
- A “qualified individual with a disability” refers to an individual with a disability who, with or without reasonable accommodation, can perform the essential functions of the employment position that the individual holds or has applied for.



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- “Reasonable accommodation” refers to making existing facilities readily accessible to and usable by individuals with disabilities, including but not limited to; job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, adjustment or modification of examinations, adjustment or modification of training materials, adjustment or modification of policies, and similar activities.
- “Undue hardship” refers to an action requiring significant difficulty or expense by the employer. The factors to be considered in determining an undue hardship include: (1) the nature and cost of the accommodation; (2) the overall financial resources of the facility at which the reasonable accommodation is to be made; (3) the number of persons employed at that facility; (4) the effect on expenses and resources or other impact upon that facility; (5) the overall financial resources of the Company; (6) the overall number of employees and facilities; (7) the operations of the particular facility as well as the entire Company; and (8) the relationship of the particular facility to the Company. These are not all of the factors but merely examples.
- “Essential job functions” refers to those activities of a job that are the core to performing the job in question.

INVITATION TO SELF-IDENTIFY

Applicants to Woodard & Curran are provided the opportunity to self-identify as Individuals With Disabilities, using language prescribed by the Office of Federal Contract Compliance Programs, at both the pre-offer and post-offer phases of the application process. In addition, employees may self-identify as Individuals With Disabilities at any time by visiting the Personal Information section of Workday, Woodard & Curran’s HRIS system. In addition, because a person may become disabled at any time, Woodard & Curran is required to ask all employees to review and update their disability status every five years. Employees may voluntarily self-identify as having a disability without fear of any punishment because they did not identify as having a disability previously.