

CSL

U.S. HUMAN RESOURCES GUIDELINES REASONABLE ACCOMMODATION FOR APPLICANTS AND EMPLOYEES UNDER THE AMERICANS WITH DISABILITIES ACT

The Company recognizes its obligation to comply with disability discrimination laws and, in appropriate circumstances, to provide reasonable accommodation for individuals with disabilities. Consistent with its obligations under the Americans with Disabilities Act (ADA) and applicable state and local laws, the Company has adopted these guidelines to establish procedures for requests for reasonable accommodation and to alert individuals about how such requests will be handled.

- A. Non-Discrimination Policy.** It is the Company's policy in all employment-related decisions to give qualified individuals with disabilities the same consideration afforded all other qualified individuals. No qualified individual with a disability will be denied or removed from consideration for employment or transfer or promotion to any position because: (a) that individual has a disability; (b) has a history of disability; (c) is regarded as having a disability; or (d) requires reasonable accommodation in order to perform the essential functions of the position.
- B. Qualified Individual with a Disability.** To be eligible for reasonable accommodation, an individual must be a qualified individual with known or identified disability. These and other terms used in these Guidelines are defined in the ADA and will be applied in accordance with those definitions and applicable federal, state and local law.
- 1. Qualified Individual.** An individual with a disability who satisfies all of the skill, experience, education and other job-related criteria and can perform the essential functions of the job with or without reasonable accommodation.
 - 2. Disability.** A qualifying disability is a mental or physical impairment that substantially limits the individual in one or more major life activities or major bodily functions and generally must be long-term or chronic. An impairment that is episodic or in remission still qualifies as disability, if the impairment would substantially limit a major life activity when active. However, not all impairments qualify as disabilities.
- C. Reasonable Accommodation.** The Company will provide reasonable accommodation to qualified individuals with disabilities, both employees and applicants. In general, reasonable accommodation in the application process means that the Company will make changes from customary application and hiring processes to enable an individual with a disability to enjoy equal access to employment opportunities. For employees, reasonable accommodation generally means a change in the work environment or the

way things are customarily done that enables an individual with a disability to enjoy equal employment opportunities.

1. The Company will provide a reasonable accommodation that is effective and does not impose an undue hardship.

Applicants: The accommodation does not have to be the "best" accommodation possible or the applicant's preferred accommodation; it should enable the applicant to participate fully in the application and hiring process.

Employees: The accommodation does not have to be the "best" accommodation possible or the employee's preferred accommodation; it should enable the employee to perform the essential functions of the job and to enjoy equal benefits and privileges of employment.

For these reasons, it may be necessary for the individual to suggest or consider alternative forms of accommodation.

2. The Company will not offer an accommodation that imposes an undue hardship, which is one that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature or operation of the business.

D. Direct Threat to Health or Safety. The Company may reject an individual with a disability for a position, or remove an employee from a position, if it is determined that the individual cannot perform the essential functions of the job without creating a direct threat to the safety or health of the individual or others and that there is no reasonable accommodation that would eliminate or reduce such a threat to an acceptable level. Any direct threat determination will be made only after an individualized assessment is undertaken of the individual's specific limitations and the essential functions of the particular job.

E. Procedures. It is critical that an applicant or employee make the Company aware of a disability and the need for a reasonable accommodation in the application or hiring process. The Company will not presume that an individual has a disability or a need for a reasonable accommodation. If an individual believes he or she has a qualifying disability and is in need of a reasonable accommodation, it is the responsibility of the individual to initiate the reasonable accommodation process, using the following procedures:

1. **Request for Accommodation.** The individual should submit a request for reasonable accommodation, including sufficient information regarding: (a) the existence of a disability; (b) the disability-related limitation or barrier that needs an accommodation, and (c) if known, the desired reasonable accommodation.

Applicants - Such requests should be submitted by following the contact instructions posted on the Company's internet site under the Career section.

Employees – Requests for accommodations should be made to the employee's respective Human Resource Department.

2. **Written Confirmation of Request.** The Company will provide the individual with written confirmation of the request by memo or email.

2a. Recurring Need for Accommodation - If an individual has a recurring need for an accommodation, such as a sign language interpreter for meetings, there is no need to submit a new request each time the accommodation is needed, once the request has been approved.

3. **Medical Documentation.** In some cases, the Company may request medical documentation to verify the existence of the disability. If so, the individual will be advised. Generally speaking, documentation will not be requested if the disability and the need for accommodation are known or readily observable.

Employees – Request for medical documentation will not be open-ended, but will be limited to documentation of the disability and the functional limitations for which accommodation is sought.

4. **Timing.**

Applicants - Requests for accommodation will be processed expeditiously and in a reasonable period depending on the circumstances. In all cases, requests will be handled within time frames to allow the applicant to participate fully in the application and hiring process.

Employees – Requests for accommodation will be processed expeditiously and in a reasonable time period depending on the circumstances. For example, the Company ordinarily processes such requests within five (5) to ten (10) business days, unless medical documentation is needed or special equipment must be ordered, in which case the process may take require additional time. If there are extenuating circumstances that delay the process, the employee will be notified by memo or email, including the reason for the delay and the projected response time.

5. **Interactive Dialogue.** If the need for accommodation is not obvious, or if additional information is needed, the Company will initiate an interactive dialogue with the individual to facilitate resolution of the request. This conversation is an opportunity for the individual to share their thoughts on what they believe is needed, or how such an accommodation could work from their

perspective. The individual is obligated to participate, cooperate and provide requested information.

Employees – The dialogue also will encompass what, if any, reasonable accommodation might be made to enable the individual to perform the full scope of his/her essential job functions. The dialogue can include the appropriate Company representatives and relevant medical professionals, if helpful.

- 6. Determination.** Requests for reasonable accommodation are evaluated on a case by case basis. The Company will make a determination based on the request and will advise the individual of the determination. If the request is denied, the individual will be notified in writing by memo or email, including the reason for the denial.
- F. Confidentiality.** All requests for accommodation, related documentation, and medical information requested as part of the process will be treated as confidential medical records in accordance with the ADA, HIPAA and other regulations.
- G. Responsibility & Questions.** The Company has a designated individual who is responsible for implementing these Guidelines.

Applicants - Any applicants with questions should follow the contact instructions posted on the Company's internet site under the Career section.

Employees – Any questions should be referred to the employee's respective Human Resources Department.