

# Notice Regarding Wellness Program

The Xerox wellness program is a voluntary wellness program available to all benefit-eligible employees. This program is administered according to federal rules that permit such employer-sponsored wellness programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990 (ADA), the Genetic Information Nondiscrimination Act of 2008 (GINA) and the Health Insurance Portability and Accountability Act (HIPAA), as applicable, among others.

Participation in the Xerox Corporation wellness program is voluntary. However, if you choose to participate, you (and your eligible spouse or domestic partner) may be asked to complete the following activities to receive a medical plan premium reduction:

- Completing the Health Assessment online by November 1, 2023 to earn a \$200 incentive
- Attesting to non-tobacco use or completing five (5) calls with a Quit for Life coach by March 31, 2024 to qualify for premium reductions of \$1,840/employee and \$1,840/spouse or domestic partner.

\*To be eligible to receive the Health Assessment incentive, you must be enrolled in a union medical plan option through Xerox and complete the Health Assessment by the specified deadline. The Health Assessment may ask you a series of questions about your health-related activities and behaviors and whether you have or had certain medical conditions (e.g., cancer, diabetes, or heart disease). Cigna, an independent health care company that is a HIPAA business associate of the plan, will use Health Assessment results to identify individuals at risk of having health problems and who qualify for the Lifestyle Management Program. By completing the Health Assessment, you agree to be contacted by the Lifestyle Management Program if the results indicate that you may benefit from participation in the program.

The information from your Health Assessment 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 through the wellness program, such as coaching or a disease management program. You also are encouraged to share your results or concerns with your own doctor.

Although you are not required to complete the Health Assessment or attest to your tobacco use, only employees that do will receive the medical plan premium reductions.

If you are unable to participate in the activity required to earn an incentive (e.g., due to a medical or physical limitation), you may be entitled to a reasonable accommodation or an alternative standard. You may request a reasonable accommodation or an alternative standard by contacting the **Xerox Benefits Center** at **1.800.428.2203** by November 1, 2023.

## PROTECTIONS FROM DISCLOSURE OF MEDICAL INFORMATION

We are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellness program and Xerox may use aggregate information it collects to design a program based on identified health risks in the workplace, the Xerox wellness program will never disclose any of your personal information, either publicly or to Xerox Corporation, except as necessary to respond to a request from you for a reasonable accommodation needed to participate in the wellness program, or as expressly permitted by law. Health information that personally identifies you 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 this 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 may receive your personally identifiable health information is the vendor administering the Health Assessment or tobacco cessation program in order to provide you with services under the wellness program.

In addition, all medical 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.

Appropriate precautions will be taken to avoid any data breach. If a data breach involving information you provide in connection with the wellness program occurs, we will notify you immediately.

You may not be discriminated against in employment because of the medical 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, the wellness program or about protections against discrimination and retaliation, please contact the **Xerox Benefits Center** at **1.800.428.2203**.