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Pregnancy, Childbirth & Lactation Accommodation Guidance and Procedure

EFFECTIVE DATE: NOV. 1, 2019

PURPOSE AND SCOPE

The purpose of this Guidance and Procedure is to define the Company's guiding principles with respect to reasonable accommodations for colleagues and applicants regarding pregnancy, childbirth, or related medical conditions, including the need to express milk for breastfeeding. This guidance and procedure applies to all U.S. and Puerto Rico based colleagues.

For colleagues with medical conditions other than pregnancy who may need accommodations, please refer to the Company's Americans With Disabilities Act Accommodation Policy.

https://pfeprod.service-now.com/fuse?id=kb_article_view&sysparm_article=KB0017279

This Guidance and Procedure provides support for colleagues as part of Pfizer's commitment to our values and to Bold Move 1.3: Make Pfizer an amazing workplace for all.

Guidance Statement

The purpose of this guidance is to address issues regarding pregnancy, childbirth, or related medical conditions that may impact a colleague's ability to perform the essential functions of their job and to ensure compliance with the accommodation requirements for such colleagues under law. Under certain federal, state and local laws, the Company generally must and will provide reasonable accommodations to colleagues and applicants regarding pregnancy, childbirth, or related medical conditions, including the need to express milk for breastfeeding. Unless otherwise required by applicable, the Company may not be able to provide an accommodation in certain instances if doing so would cause an undue hardship on the Company's business operation.

Reasonable accommodations for the colleague, may include, but are not limited to,

1. making existing facilities readily accessible;
2. providing seating or seating modifications or allowing the employee to sit more frequently;
3. more frequent or longer bathroom breaks;
4. breaks for increased water or food intake;
5. reasonable break time each day to express breast milk. For purposes of expressing breast milk, the Company will provide a suitable room or other location with privacy, other than a bathroom, in reasonably close proximity to the work area with access to an electrical outlet and a refrigerator to store expressed milk. If possible and permitted by applicable law, the break time must run concurrently with rest and meal periods already provided to the employee. Break time that cannot run concurrently with rest and meal periods already provided to the employee will be unpaid, to the extent permitted by applicable law.;



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6. periodic rest;
7. assistance with manual labor;
8. job restructuring or modified work schedules;
9. light-duty assignments;
10. excusing from, or providing assistance for, lifting tasks;
11. acquisition or modification of equipment, mechanical or electrical aids;
12. temporary transfers to less strenuous or hazardous work; or
13. time off for a reasonable period of time to recover from childbirth, or for doctor's appointments. While such time is not paid by the Company unless otherwise required by law, employees may be entitled to statutory benefits and the Company will allow employees to use vacation time to supplement such statutory benefits. Employees also may use other paid time off available for these purposes, to the extent required and in accordance with applicable law.

The Company will not require a colleague or applicant affected by pregnancy, childbirth, or a related medical condition to accept an accommodation that the individual chooses not to accept if the individual did not request an accommodation or if the accommodation is not necessary for the applicant or employee to perform the essential functions of the job, nor will the Company require a colleague to take a leave under any applicable leave law or company policy, or terminate the colleague's employment, if another reasonable accommodation that does not pose an undue hardship for the Company can be provided. Nothing in this guidance requires the Company to provide the preferred accommodation requested where other reasonable accommodations are available, to the maximum extent permitted by applicable law, and in any event, the Company shall have final discretion to determine the appropriate reasonable accommodation consistent with its legal obligations. The Company will process requests for accommodations and, where appropriate, provide reasonable accommodations in a prompt, fair and efficient manner.

The Company has explained below the process a colleague or applicant should follow to initiate the process for requesting an accommodation; the circumstances where a colleague or applicant may be asked to provide medical documentation to support requests for an accommodation; and procedures relating to the Company's decision regarding a request for accommodation.

The Company will not discriminate or retaliate against, take any adverse action against, or deny any employment opportunity to, a colleague, or refuse to hire an applicant, based on pregnancy, childbirth, or related medical conditions including lactation accommodations, a request for reasonable accommodation or the need of the Company to make a reasonable accommodation regarding pregnancy, childbirth, or related medical conditions including lactation accommodations, or filing or cooperating in the investigation of a complaint under this policy or applicable law..

Pfizer's NYODisability Team, is responsible for implementing and administering this process and can be contacted via Telephone (877) 472-8436; Fax (212)- 573-7351 or email at NYODisability@pfizer.com.

ACCOMMODATION PROCESS - COLLEAGUES

To obtain an accommodation, the colleague must inform the Company of the existence of an issue regarding pregnancy, childbirth, or related medical conditions that needs to be accommodated, and, if known, the desired accommodation. Upon receipt of this information from the colleague or otherwise learning of the colleague's need for an accommodation, the Company will engage in a timely, good faith, and interactive

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dialogue with the colleague and if necessary and permitted by applicable law, the colleague's healthcare provider to determine what, if any, accommodation(s) can be granted.

1. Initiating a Request for Accommodation

A colleague seeking an accommodation should contact NYODisability Team at: NYODisability@pfizer.com; Telephone (877) 472-8436; Fax (212)-573-7351 and may request an accommodation either orally or in writing. A request for an accommodation is any communication to Colleague Wellness or the NYODisability team in which a colleague asks for or states that the colleague needs the Company to provide or to change something about the job or workplace because of an issue regarding pregnancy, childbirth, or related medical conditions.

The Company also may initiate the accommodation process whenever it reasonably believes that an issue regarding pregnancy, childbirth, or related medical conditions may be limiting a colleague's ability to perform their essential job functions safely or successfully or to gain access to facilities.

Absent unusual circumstances or where such requirement is otherwise restricted by applicable law, colleagues requesting accommodation(s) are required to complete and return an Accommodation Request Form to NYODisability Team. Colleagues should not request accommodation(s) directly from their managers, supervisors or People Experience (PX), but should contact NYODisability Team. Any manager, supervisor or HR professional who receives a request for accommodation directly from a colleague should refer the colleague to NYODisability Team. In such circumstances, the manager, supervisor or HR professional also should inform NYODisability Team that the colleague approached them regarding an accommodation request and that the manager, supervisor or HR professional referred the colleague to NYODisability Team.

If a colleague is unable to perform all of their essential job functions while the accommodation request is being considered, the colleague's manager and NYODisability Team will together determine the acceptable essential work functions, if any, that can be performed during the review period of the accommodation request.

An interim adjustment to any essential work functions does not imply that the requested accommodation is reasonable or will be granted. The Company reserves the right to grant or deny a requested accommodation after the request is fully considered and evaluated by NYODisability Team, regardless of a decision to permit or reject an interim adjustment to the work functions during NYODisability Team review.

2. Supporting Medical Documentation and Information

Upon NYODisability Team's receipt of an accommodation request from a colleague, NYODisability Team reserves the right to require supporting medical documentation and information, to the extent permitted by applicable law. This documentation may include, but is not limited to, the date the reasonable accommodation becomes medically advisable, the probable duration of the accommodation, and a statement regarding the medical advisability of the accommodation.

3. Decisions Regarding a Request for Accommodation

Once a decision on a requested accommodation is reached, NYODisability Team will provide a written response to the colleague regarding the accommodation requested and the determination. As a result of and in furtherance of the interactive process, the determination by NYODisability Team may be to grant an alternative accommodation rather than the accommodation that was initially requested by the colleague. The Company reserves the right to deny an accommodation if the accommodation poses an undue hardship on the

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Company's operations, to the maximum extent permitted by applicable law. In the event the colleague believes that additional or different accommodations are required because of changes in the underlying medical condition or changes in job requirements, the colleague should bring these proposed changes forward to NYODisability Team for review.

4. Accommodation Process – Applicants

Job applicants may request reasonable accommodations regarding pregnancy, childbirth, or related medical conditions enabling them to participate fully in the application and/or interviewing process. Applicants seeking accommodation(s) should contact Talent Acquisition (TA) to request accommodation(s), and TA will consult with NYODisability Team. Requests for accommodation concerning the application/interviewing process will be handled expeditiously to enable applicants to progress through the application process in a timely fashion. Applicants should submit requests for accommodation(s) in connection with the application process to:

Global Talent Acquisition
Pfizer Inc.
235 East 42nd Street
NYO-235-16-01 New York, NY 10017
RecruitingAccommodations@pfizer.com

5. Confidentiality of Medical Information

All medical information, including information about functional limitations and accommodation needs, obtained in the course of processing a colleague's or applicant's request for an accommodation will be kept in confidential files maintained by NYODisability Team. With limited exceptions, only individuals involved in the decision about whether to grant the request for accommodation will be provided access to confidential medical information pertaining to a requested accommodation. However, members of management may be informed of the functional limitations of an applicant and/or a colleague and the nature of the accommodation sought to determine whether the accommodation can be granted without an undue hardship to the business. Similarly, members of management may be informed of the accommodation granted in effort to ensure compliance with the decision made.

Any colleague who fails to maintain medical information confidentially will be subject to disciplinary action up to and including termination of employment.

ADDITIONAL QUESTIONS

If there are questions regarding the Company's Pregnancy Accommodation Guidance, contact NYODisability Team.

CALIFORNIA ADDENDUM FOR CALIFORNIA EMPLOYEES:

The Company supports the legal right and necessity of employees who choose to express milk in the workplace. This policy is to establish guidelines for promoting a breastfeeding-friendly work environment and supporting lactating employees at the Company for as long as they desire to express breastmilk.

Restrooms are prohibited from being utilized for lactation purposes.

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California law and the San Francisco Lactation in the Workplace Ordinance expressly prohibits discrimination or retaliation against lactating employees for exercising their rights granted by the ordinance. This includes those who request time to express breast milk at work and/or who lodge a complaint related to the right to lactation accommodations.

Employees have the right to file a complaint with the Labor Commissioner for any violation of the rights underlying this policy.

ILLINOIS ADDENDUM FOR ILLINOIS EMPLOYEES:

In compliance with Illinois law, the Company will not deny employment opportunities or take adverse employment action against employees if such decision is based on the employer's need to make a reasonable accommodation, and the Company will not retaliate against an employee who requests an accommodation or otherwise exercises the employee's rights under the Illinois Human Rights Act.

The Illinois Human Rights Act is enforced by the Illinois Department of Human Rights ("IDHR"). The charge process for violations of the law can be initiated by completing the form at <http://www.illinois.gov/dhr> or by contacting the IDHR at IDHR.Intake@illinois.gov, or any of these offices:

Chicago Office
100 W. Randolph St., 10th Floor
Chicago, IL 60601
(312) 814-6200
(866) 740-3953 (TTY)
(312) 814-6251 (Fax)

Springfield Office
535 W. Jefferson Street, 1st Floor
Springfield, IL 62702
(217) 785-5100
(866) 740-3953 (TTY)
(217) 785-5106 (Fax)

BALTIMORE, MARYLAND ADDENDUM FOR BALTIMORE, MARYLAND EMPLOYEES:

Pursuant to the Baltimore City Lactation Accommodation in the Workplace Ordinance (the "Ordinance"), employees have a legal right to request a lactation accommodation.

The Company will respond to accommodation requests within five (5) business days, and engage in an interactive process with the employee to determine lactation break periods and a lactation location appropriate for the employee. The Company may not be able to provide lactation breaks or a lactation location if doing so would impose an undue hardship on the Company. If the Company is unable to provide lactation breaks or a lactation location, or provides a lactation location that does not fully comply with the Ordinance or the Company asserts any waiver or variance granted pursuant to the Ordinance, the Company will, in response to any request for a lactation accommodation, provide a written response specifying the reasons why the Company cannot provide a lactation breaks or a lactation location.

Retaliation against an employee for exercising their right under that Ordinance is prohibited. An employee who believes their rights under the Ordinance have been violated may file a complaint with Corporate Compliance Corporate.Compliance@Pfizer.com (212) 733-3026, or with the Baltimore Community Relations Commission.

MASSACHUSETTS ADDENDUM FOR MASSACHUSETTS'S EMPLOYEES

Pursuant to Massachusetts Pregnant Workers Fairness Act (the "Act"), employees have the right to be free from discrimination in relation to pregnancy or a condition related to the employee's pregnancy including, but not limited to, lactation or the need to express breast milk for a nursing child, including the right to reasonable accommodations for

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conditions related to pregnancy.

The Company may require that documentation about the need for a reasonable accommodation come from an appropriate health care or rehabilitation professional; provided, however, that the Company will not require documentation from an appropriate health care or rehabilitation professional for the following accommodations: (i) more frequent restroom, food or water breaks; (ii) seating; (iii) limits on lifting more than 20 pounds; and (iv) private non-bathroom space for expressing breast milk. The Company also may require documentation for an extension of the accommodation beyond the originally agreed to accommodation.

The Company will not:

- 1) take adverse action against an employee who requests or uses a reasonable accommodation in terms, conditions or privileges of employment including, but not limited to, failing to reinstate the employee to the original employment status or to an equivalent position with equivalent pay and accumulated seniority, retirement, fringe benefits and other applicable service credits when the need for a reasonable accommodation ceases;
- 2) deny an employment opportunity to an employee if the denial is based on the need of the Company to make a reasonable accommodation to the known conditions related to the employee's pregnancy including, but not limited to, lactation or the need to express breast milk for a nursing child;
- 3) require an employee affected by pregnancy, or require said employee affected by a condition related to the pregnancy, including, but not limited to, lactation or the need to express breast milk for a nursing child, to accept an accommodation that the employee chooses not to accept, if that accommodation is unnecessary to enable the employee to perform the essential functions of the job;
- 4) require an employee to take a leave if another reasonable accommodation may be provided for the known conditions related to the employee's pregnancy, including, but not limited to, lactation or the need to express breast milk for a nursing child, without undue hardship on the Company's program, enterprise or business;
- 5) refuse to hire a person who is pregnant because of the pregnancy or because of a condition related to the person's pregnancy, including, but not limited to, lactation or the need to express breast milk for a nursing child; provided, however, that the person is capable of performing the essential functions of the position with a reasonable accommodation and that reasonable accommodation would not impose an undue hardship, demonstrated by the Company, on the Company's program, enterprise or business.

An employee who notifies the Company of a pregnancy or an employee who notifies the Company of a condition related to the employee's pregnancy including, but not limited to, lactation or the need to express breast milk for a nursing child will receive an additional copy of this notice not more than 10 days after such notification.

NEVADA ADDENDUM FOR NEVADA EMPLOYEES

Pursuant to Nevada Revised Statute § 613.335 and sections 2 to 8, inclusive, of the Nevada Pregnant Workers' Fairness Act (the "Act"), employees have the right to be free from discriminatory or unlawful employment practices based on pregnancy, childbirth, or a related medical condition.

Under the Act, the Company may not:

- Deny a reasonable accommodation to female employees and applicants, upon request, for a condition related to pregnancy, childbirth, or a related medical condition, unless an accommodation would impose an undue hardship on the business of the Company.
- Take adverse employment actions against a female employee or applicant based on a need for a reasonable accommodation.
- Deny an employment opportunity to a qualified female employee or applicant based on a need for a reasonable accommodation.

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- Require a female employee or applicant to accept an accommodation that the employee or applicant did not request or chooses not to accept or to take leave from employment if an accommodation is unavailable (except for construction employees whose primary duties involve performing manual labor).

Under the Act, the Company may:

- Require a female employee to submit written medical certification from the employee's physician substantiating the need for an accommodation because of pregnancy, childbirth, or related medical conditions, and the specific accommodation recommended by the physician.

Under the Act, the Company and the employee must:

- Engage in a timely, good faith interactive process to determine an effective, reasonable accommodation, subject to the terms of the policy and law stated above.

For further information regarding the Act, contact the Nevada Equal Rights Commission.

**Equal Rights Commission
Las Vegas**

1820 East Sahara Avenue
Suite 314
Las Vegas, NV 89104
Phone (702) 486-7161

**Equal Rights Commission
Northern Nevada**

1325 Corporate Blvd.
Room 115
Reno, NV 89502
Phone (775) 823-6690

NEW YORK CITY, NEW YORK ADDENDUM FOR NEW YORK CITY, NEW YORK EMPLOYEES

After receiving a request for an accommodation due to pregnancy, childbirth, or a related medical condition or learning indirectly that an employee requires such an accommodation, the Company will engage in a cooperative dialogue with the employee. Even if an employee has not formally requested an accommodation, the Company may initiate a cooperative dialogue under certain circumstances, such as when the Company has knowledge that an employee's performance at work has been negatively affected and a reasonable basis to believe that the issue is related to pregnancy, childbirth, or related medical condition, in compliance with applicable law.

The cooperative dialogue may take place in person, by telephone, or by electronic means. As part of the cooperative dialogue, the Company will communicate openly and in good faith with the employee in a timely manner in order to determine whether and how the Company may be able to provide a reasonable accommodation. To the extent necessary and appropriate based on the request, the Company will attempt to explore the existence and feasibility of alternative accommodations as well as alternative positions for the employee. The Company is not required to provide the specific accommodation sought by an employee, provided the alternatives are reasonable and either meet the specific needs of the employee or specifically address the employee's limitation.

As part of the cooperative dialogue, the Company reserves the right to request medical documentation from an employee under the following circumstances:

- 1) when an employee requests time away from work, including for medical appointments, other than time off requested during the six (6) to eight (8) week period following childbirth (for recovery from childbirth) or
- 2) when an employee requests to work from home, either on an intermittent basis or a longer-term basis.

If the Company believes that the provided documentation is insufficient, and before denying the request based on insufficient documentation, the Company reserves the right to request additional documentation from the employee or, upon the employee's consent, speak with the health care provider who provided the documentation. As applicable, an employee whose time off is covered by the Family Medical Leave Act (FMLA) may also be required to provide medical documentation, depending on the circumstances of the leave request, pursuant to federal law.

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At the conclusion of the cooperative dialogue, the Company will provide written notice to the employee in a timely manner indicating that the Company:

- 1) will be able to offer and provide a reasonable accommodation,
- 2) will not be able to provide a reasonable accommodation to the employee because there is no accommodation available that will not cause an undue hardship on the Company's operations, or
- 3) will not be able to provide a reasonable accommodation to the employee because no accommodation exists that will allow the employee to perform the essential requisites of the job.

The Company will endeavor to keep communications regarding requests for reasonable accommodations and all circumstances surrounding an employee's pregnancy, childbirth, or related medical condition confidential.

Pursuant to New York City law, employees also have a right to request access to a lactation room for purposes of expressing breast milk. The Company will provide a lactation room to such employees, unless doing so would impose an undue hardship on the Company. If doing so poses an undue hardship to the Company, the Company will engage in a cooperative dialogue with the employee to discuss reasonable alternatives with the employee in an attempt to accommodate the employee's needs.

For purposes of this policy, the term lactation room means a sanitary place, other than a restroom, that can be used to express breast milk shielded from view and free from intrusion and that includes at minimum an electrical outlet, a chair, a surface on which to place a breast pump and other personal items, and nearby access to running water. Unless doing so poses an undue hardship, the Company will provide (i) a lactation room in reasonable proximity to the employee's work area and (ii) a refrigerator suitable for breast milk storage in reasonable proximity to such employee's work area. If the room designated by the Company to serve as a lactation room is also used for another purpose, the sole function of the room will be as a lactation room while an employee is using the room to express breast milk. While an employee is using the room to express milk, the Company will provide notice to other employees that the room is given preference for use as a lactation room.

An employee may submit a request for a lactation room by contacting Colleague Wellness. The Company will respond to such requests within five (5) business days. If two or more employees need to use the lactation room at the same time, the employees should contact Colleague Wellness so that arrangements can be made to ensure all employees are provided with access to the lactation room amenities. Options may include: finding an alternative clean space free from intrusion; sharing the space among multiple users; or creating a schedule for use.

PITTSBURGH, PENNSYLVANIA ADDENDUM FOR PITTSBURGH, PENNSYLVANIA EMPLOYEES

In compliance with the Pittsburgh City Code, the Company will not discriminate against an employee because of pregnancy, childbirth, or related medical conditions and events. The Company will endeavor to reasonably accommodate an employee affected by pregnancy, childbirth, or related medical conditions as well as an employee who is the partner of a person who is pregnant or affected by a related medical condition in order to allow the employee to perform the essential duties of their job unless doing so will impose an undue hardship on the Company's business.

After receiving a request for an accommodation due to pregnancy, childbirth, or a related medical condition or otherwise becoming aware that an employee requires such an accommodation, the Company will engage in an interactive process with the employee. Even if an employee has not formally requested an accommodation, the Company may initiate an interactive process under certain circumstances, such as when the Company has knowledge that an employee's performance at work has been negatively affected and a reasonable basis to believe that the issue is related to the employee's or their partner's pregnancy, childbirth, or related medical condition, in compliance with applicable law.

The interactive process may take place in person, by telephone, or by electronic means such as e-mail. As part of the

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interactive process, the Company will communicate with the individual in order to determine whether and how the Company may be able to provide a reasonable accommodation. To the extent necessary and appropriate based on the request, the Company will attempt to explore the existence and feasibility of alternative accommodations as well as alternative positions for the individual. The Company is not required to provide the specific accommodation sought by an individual, provided the alternatives are reasonable and either meet the specific needs of the individual or specifically address the individual's limitations.

As part of the interactive process, the Company reserves the right to request medical documentation, to the extent permitted by applicable law. If the Company believes that the provided documentation is insufficient, and before denying the request based on insufficient documentation, the Company reserves the right to request additional documentation from the employee or, upon the employee's written consent, speak with the health care provider who provided the documentation. As applicable, an employee whose time off is covered by the Family Medical Leave Act (FMLA) may also be required to provide medical documentation, depending on the circumstances of the leave request, pursuant to federal law.

At the conclusion of the interactive process, the Company will provide written notice to the employee in a timely manner indicating that the Company:

- 1) will be able to offer and provide a reasonable accommodation,
- 2) will not be able to provide a reasonable accommodation to the employee because there is no accommodation available that will not cause an undue hardship on the Company's operations, or
- 3) will not be able to provide a reasonable accommodation to the employee because no accommodation exists that will allow the employee to perform the essential requisites of the job.

PUERTO RICO ADDENDUM FOR PUERTO RICO EMPLOYEES:

In compliance with Puerto Rico law, the Company recognizes the right of working mothers to breastfeed or express milk for breastfeeding at their workplace and will not discriminate against an employee because of pregnancy.

As required by Puerto Rico law, a female employee who returns from maternity leave and who works at least seven and a half hours per workday is entitled to a paid break of one full hour within each full working day, which may be divided into two 30-minute or three 20-minute breaks, to nurse or express milk for breastfeeding in an area which the Company has designated for this purpose. Female employees returning from maternity leave and who work more than four hours but less than seven and a half hours per workday are entitled one 30-minute break per day for the same purpose.

In compliance with Puerto Rico law and the Guidelines for the Establishment of Nursing Rooms issued by the Women's Solicitor Office, the Company has adopted the following policy:

Location and Use of Nursing Room

The Company has designated a private and accessible nursing room. This area provides privacy for the extraction of breastmilk, is safe, hygienic and has a lock. In addition, the Company has established a documented cleaning process for this area.

The room has a log that will be used to record the hours of use by nursing mothers. If necessary, the Company may identify additional nursing rooms, which will comply with this Policy.

Process to Request Use of Nursing Room

A nursing mother who wishes to use the nursing room should contact Colleague Wellness who will identify the available nursing room, discuss the hours available for use and access to it. The agreed time for the extraction of breastmilk shall be set out in a document to be signed by the nursing mother and a Company representative.

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Equipment Available at the Nursing Room

The nursing room is equipped with the following:

- Comfortable and stable chair
- Support table
- Paper towels
- Electrical outlets for the connection of the breastmilk extraction equipment
- Trash cans

Also, the nursing mother will have access to a refrigerator for the storage of breastmilk and to a sink to wash the equipment before and after extraction.

Nursing Room Cleaning Process

The cleaning team designated by the Company shall be responsible for cleaning and disinfecting the room. The cleaning process is documented in the Company's record for that purpose. The room also has adequate ventilation and air conditioning ducts are subject to maintenance procedures.

General Rules for the Use of the Nursing Room

A nursing mother who wishes to use the nursing room must comply with the following rules:

1. Only one nursing mother will be allowed at a time in the nursing room and no companion or any other staff will be allowed inside the nursing room while it is in use.
2. Before and after using the nursing room, the nursing mother must enter her full name and the time of entry and exit of the nursing room in the visitors' log.
3. The entry and consumption of food in the nursing room is not allowed.
4. Mothers should bring their own equipment to express, store and transport breastmilk.
5. The refrigerator is exclusive for the temporary storage of the maternal milk, during the duration of the mother's workday.
6. After each use, the nursing room should be left clean so that the next nursing mother finds the room in optimal conditions.
7. After using the nursing room, the nursing mother must ensure that the door is locked and hand the key to the designated person.

This policy does not include a comprehensive list of available rights for colleagues and applicants regarding pregnancy, childbirth, or breastfeeding, such as paid maternity leave, short-term disability leave and other available leaves. The Company reserves the right to interpret the provisions of this Policy and amend it as necessary.

VIRGINIA ADDENDUM FOR VIRGINIA EMPLOYEES

In compliance with Virginia law, the Company will endeavor to not fail or refuse to hire, discharge, or otherwise discriminate against any individual with respect to such individual's compensation, terms, conditions, or privileges of

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employment on the basis of pregnancy, childbirth, or related medical conditions. Further, the Company will not refuse to make reasonable accommodation to the known limitations of a person related to pregnancy, childbirth, or related medical conditions, unless the Company can demonstrate that the accommodation would impose an undue hardship on the Company.

The Company will not take adverse action against an employee who requests or uses a reasonable accommodation pursuant to this policy, including failure to reinstate any such employee to the employee's previous position or an equivalent position with equivalent pay, seniority, and other benefits when the employee's need for a reasonable accommodation ceases.