



## WWHR US/PR POLICY

### Title: Americans With Disabilities Act Accommodation Policy

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Sponsoring Division: WWHR North American Division

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### Americans With Disabilities Act Accommodation Policy

#### Purpose and Scope

The purpose of this Policy and Procedure is to define WWHR's guiding principles with respect to accommodations for colleagues and applicants with disabilities. This policy and procedure applies to all US/PR Based Colleagues. For colleagues who require an accommodation due to pregnancy, please refer to the company's [Pregnancy Accommodation Guidance and Procedure](#).

#### Policy Statement

The purpose of this policy is to address disability issues that may impact a colleague's ability to perform the essential functions of his or her job and to ensure compliance with the accommodation requirements of the Americans with Disabilities Act (ADA) and other applicable federal, state or local laws. Under the ADA and certain state and local laws, the Company must provide a reasonable accommodation to otherwise qualified applicants or colleagues with disabilities, unless to do so would cause an undue hardship. A reasonable accommodation is a change in the workplace or the way things are customarily done that provides an equal employment opportunity to an individual with a disability, including changes that enable an individual to apply for a job, perform a job, or have equal access to the workplace and employee benefits.

The Company is committed to providing reasonable accommodations to ensure that qualified individuals with disabilities enjoy equal employment opportunities. Generally, the Company will provide an accommodation in the following circumstances:

- when an applicant with a disability requires an accommodation to be considered for jobs;
- when a colleague with a disability requires an accommodation to enable him/her to perform the essential functions of his/her job or to gain access to the workplace; and
- when a colleague with a disability requires an accommodation to enjoy equal benefits and privileges of employment.

The Company will process requests for accommodation 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 may be asked to

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provide medical documentation to support requests for an accommodation; and procedures relating to the Company's decision regarding a request for accommodation, including how a colleague may appeal the Company's denial of an accommodation request. Pfizer's Director, Occupational Health and Wellness, 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](mailto:NYODisability@pfizer.com).

### **Accommodation Process - Colleagues**

To obtain an accommodation, the colleague must inform the Company of the existence of a disability, the disability-related limitation(s) or workplace barrier(s) that need to be accommodated, and, if known, the desired accommodation. Upon receipt of this information, the Company will engage in an interactive dialogue with the colleague and if necessary, his/her 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 his/her local Occupational Health and Wellness (OHW) office or the OHW Pfizer Disability Group at: [NYODisability@pfizer.com](mailto: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 in which a colleague asks for or states that he/she needs the Company to provide or to change something about the job or workplace because of a medical condition.

The Company also may initiate the accommodation process whenever it reasonably believes that a physical or mental impairment may be limiting a colleague's ability to perform his/her essential job functions safely or successfully or to gain access to facilities.

Absent unusual circumstances, colleagues requesting accommodation(s) are required to complete and return an Accommodation Request Form to OHW.

Colleagues should not request accommodation(s) directly from their managers, supervisors or Human Resources (HR), but should contact OHW. Any manager, supervisor or HR professional who receives a request for accommodation directly from a colleague should refer the colleague to OHW. In such circumstances, the manager, supervisor or HR professional also should inform OHW that the colleague approached regarding an accommodation request and that he/she referred the colleague to OHW.

If a colleague is unable to perform all of his/her job duties while the accommodation request is being considered, his/her manager and OHW will together determine the

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acceptable, work functions, if any, that can be performed during the review period of the accommodation request. Any interim adjustment to the 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 OHW, regardless of a decision to permit or reject an interim adjustment to the work functions during OHW review.

## **2. Supporting Medical Documentation and Information**

Upon OHW's receipt of an accommodation request from a colleague, OHW will request that the colleague provide medical documentation necessary to substantiate the disability and the functional limitations for which accommodation is sought. (Note: The Company will not request or require such medical documentation in any situation where it concludes that the disability for which accommodation is sought is known or readily observable and the need for and type of appropriate accommodation are known or obvious.)

A colleague and/or his/her health care provider(s) should submit the requested medical documentation directly to OHW, not to the colleague's manager, supervisor or HR. The colleague is responsible for providing OHW with timely, complete and sufficient medical documentation. The Company may deny a request for accommodation if, in its judgment, the colleague unreasonably fails to provide the requested medical documentation in a timely manner.

Where appropriate, OHW will contact a colleague's health care provider(s) to discuss and/or clarify submitted medical documentation. In addition, if information provided by a colleague's health care provider is insufficient, the Company may request the colleague to be examined by a health care provider of the Company's choosing. The Company considers such communications and/or requests for additional medical examinations as part of the ADA interactive process and colleagues are expected to cooperate with such requests including, for example, executing medical authorizations required by the colleague's health care providers. The Company may deem a failure to cooperate with the Company's lawful request for medical information, documentation or medical examinations to be a failure by the colleague of his/her obligations to engage in the interactive ADA process which, in turn, may result in a delay in processing and/or denial of a reasonable accommodation request.

## **3. Decisions Regarding a Request for Accommodation**

Once a decision on a requested accommodation is reached, OHW will provide a written response to the colleague regarding the accommodation requested and the

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determination. As a result of and in furtherance of the interactive process, the determination by OHW may be to grant an alternative accommodation rather than the accommodation that was initially requested by the colleague.

OHW may request recertification of an accommodation request that has been granted if there is reason to believe the colleague is no longer disabled; the colleague's disability no longer requires accommodation; and/or the accommodation being provided is no longer reasonable or effective. The Company also may discontinue any accommodation previously granted if it determines that the colleague is no longer disabled; the accommodation is no longer needed, reasonable or effective; or the continued accommodation poses an undue hardship. The colleague is expected to cooperate with the Company in these circumstances. 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 OHW for review.

If a request for an accommodation is denied, a colleague may appeal that decision. A colleague appealing a denial must submit the appeal in writing (absent exceptional circumstances ) within 14 days of the denial, and must include the reason(s) he/she believes the request should be granted and provide any additional medical documentation to substantiate his or her request. The first level appeal should be submitted to:

NYO Disability Team  
Occupational Health and Wellness  
Pfizer Inc.  
235 East 42<sup>nd</sup> Street  
New York, NY 10017  
Tel. (877) 472-8436  
Fax (212)-573-7351  
[NYODisability@Pfizer.com](mailto:NYODisability@Pfizer.com)

If the denial is upheld on the first level appeal the colleague may request an escalated second level appeal which will be the final and binding decision related to the request. A second level appeal should be submitted in writing (absent exceptional circumstances ) within 14 days of denial of the first level appeal to:

ADA Appeals Group  
Occupational Health and Wellness  
Pfizer Inc.  
500 Arcola Road  
Mailstop E-3710

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Collegeville, PA 19426.  
Tel. (484) 865-6060  
Fax (484) 865-9359

### **Accommodation Process - Applicants**

Job applicants may request reasonable accommodation(s) if necessary to provide them equal employment opportunities, including 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 OHW as necessary. 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 42<sup>nd</sup> Street  
NYO-235-16-01  
New York, NY 10017  
[Globalrecruiting@pfizer.com](mailto:Globalrecruiting@pfizer.com);

### **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 OHW. 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.

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

### **Additional Questions**

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If there are questions regarding the Company's ADA Accommodation Policy, contact Occupational Health and Wellness.