

NOTICE REGARDING WELLNESS PROGRAM

Healthy Habits Rewards program is a voluntary wellness program available to all employees. The program is administered according to federal rules permitting employer-sponsored wellness programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990, the Genetic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act, as applicable, among others. If you chose to participate in the wellness program you will be asked to complete a biometric screening, which will include a blood test for blood chemistry profile for 27 individual tests, prostate specific antigen (PSA) for males age 40 and over and A1C for participants stating they are a diabetic at time of screening or if their fasting glucose is over 100. In addition, you will be asked to complete an annual wellness physical with your physician. You are not required to participate in the biometric screening or annual physical.

However, employees who choose not to participate in the wellness program will be subject to the Base Rate Premium instead of the Wellness Discount Premium for no participation in the biometric screening. Although you are not required to participate in the biometric screening, only employees who do so will have the Wellness Discount Premium.

The information from your biometric screening 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. You also are encouraged to share your results or concerns with your own doctor. Additional incentives of up to \$7 or \$9 (depending on medical plan) may be available for employees who participate in certain health-related activities, including tobacco/nicotine testing or achieve certain health outcomes, such as negative tobacco/nicotine testing. If you are unable to participate in any of the health-related activities or achieve any of the health outcomes required to earn an incentive, you are entitled to a reasonable accommodation or an alternative standard of American Lung Association Freedom from Smoking Program or Wilson Health Tobacco Treatment Counseling. You may request a reasonable accommodation or an alternative standard by contacting Nick Jones at 419/996-4709 or Kim Stewart at 419/996-4896.

Protections from Disclosure of Medical Information

We are required by law to maintain the privacy and security of your personally identifiable health information. Although American Trim, the Healthy Habits Rewards program and HealthWorks may use aggregate information it collects to design a program based on identified health risks in the workplace, HealthWorks will never disclose any of your personal information either publicly or to the employer, 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. Medical information that personally identifies you that is provided in connection with the Healthy Habits Rewards 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 the wellness program or receiving an incentive. In order to provide consulting and data aggregation services to the wellness program and health plan, your health information may be shared with the plan's health insurance consultant or other outside vendor. Anyone who receives your information will abide by the same confidentiality requirements. The only individuals who will receive your personally identifiable health information are a registered nurse or health coach 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, and in the event a data breach occurs involving information you provide in connection with the wellness program, 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, or about protections against discrimination and retaliation, please contact the Benefits Department – Nick Jones at 419/996-4709 or Kim Stewart at 419/996-4896.