

Policy Regarding Employees with Disabilities

PAQ, Inc. is an equal-opportunity employer and does not discriminate against employees or applicants for employment on the basis of any protected characteristics, including disabilities. PAQ, Inc. takes all reasonable steps necessary prevent discrimination against qualified individuals with disabilities. This policy describes PAQ's policies and procedures regarding nondiscrimination against, accommodation of, and engagement in the interactive process with, qualified individuals with disabilities. This policy supersedes any and all prior policies and practices regarding treatment of employees with disabilities, reasonable accommodations and/or the interactive process.

What is a Disability?

Both California and federal law expressly prohibit discrimination against qualified individuals with a disability. Under California law, a disability is any condition, whether physical or mental, that limits a major life activity. Under federal law, a disability is any condition, whether physical or mental, that substantially limits a major life activity.

A major life activity includes, but is not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

A qualified individual with a disability is a person who, while having a disability, meets the legitimate skill, experience, education, or other requirements of an employment position and is able to perform the essential functions of that position with or without reasonable accommodation.

Non-Discrimination Policy

At PAQ, Inc., qualified individuals with disabilities will not be discriminated against with respect to any aspect of their job, including but not limited to recruitment, hiring, firing, training, job assignments, promotions, pay, benefits, layoff, leave, or any other employment-related activity. PAQ, Inc. will also not discriminate against any individual who has a record of a disability or who is regarded as having a disability. Should any employee believe that they are being discriminated against by anyone at PAQ, Inc. based on their disability, their record of having a disability, or the perception that they have a disability, the employee should immediately report their concerns as outlined in the "Complaint Process" section below.

Reasonable Accommodations for Disability

California and federal law require that employers provide reasonable accommodations to qualified employees with disabilities, and further requires employers to engage in a good-faith interactive process to determine what accommodations may be necessary for and can be provided to the employee.

PAQ, Inc. complies with all applicable federal and state laws and is committed to making every effort to reasonably accommodate qualified individuals with a disability and will engage in a good-faith interactive process with disabled employees to determine what reasonable accommodations are required by the employee. PAQ, Inc. will make every effort to furnish employees with reasonable accommodations that permit the employee to perform the essential functions of their employment position. Reasonable accommodations will be determined on a case-specific basis after engaging in a good-faith interactive process with the employee. Examples of reasonable accommodations that may be provided include, but are not necessarily limited to:

- Job restructuring that does not require elimination of any essential functions of the position;
- Leave of absence;
- Modified work schedule; and
- Reassignment to a vacant position.

PAQ, Inc. need not make accommodations that will impose an undue hardship on the operation of PAQ, Inc.'s business or pose a direct threat to the health or safety to themselves or others.

If you require a reasonable accommodation to participate in the application process or to perform the essential functions of your position, contact your Human Resources Manager, and inform them of any accommodations you may need. It is critical that you make PAQ, Inc. aware of your need for an accommodation. PAQ, Inc. may require you to submit medical documentation from an appropriate health care provider to verify any and all work-related limitations you may have and that, with or without accommodation, you are capable of performing your essential job functions. Medical verification is due within twenty days of a request by PAQ, Inc. for a verification. PAQ, Inc. will not ask that you or your health care provider divulge any specific medical condition or disability. Properly trained personnel will be involved in all aspects of the interactive process between PAQ, Inc. and the employee.

Employees who require leave as a reasonable accommodation must contact FMLA Source at 1-877-462-3652 or by logging on to www.fmlasource.com. Leaves of absence provided as a reasonable accommodation for a disability are not limited to any predetermined length. However, such leaves may not be indefinite nor may they result in undue hardship to PAQ, Inc.'s business operations.

Final decisions regarding accommodation requests will be made by the Vice President of Human Resources. Complaint Process

Any employee who believes that they have been discriminated against because of a disability, believes that PAQ, Inc. has failed to reasonably accommodate their disability, or believes that they have been retaliated against because of requesting an accommodation must immediately report it to their Human Resources Manager. Complaints will be kept confidential to the fullest extent practicable.

All complaints of discrimination, failure to accommodate, or retaliation will be promptly, thoroughly, and impartially investigated. Employees who make a good-faith complaint of discrimination, failure to accommodate, or retaliation will not be retaliated against in any way. PAQ, Inc. will take immediate and appropriate corrective action when it determines that discrimination, failure to accommodate, and/or retaliation has occurred.

Employees, or applicants for employment, who believe they have been subjected to disability discrimination, harassment, or retaliation may also report it to the federal Equal Employment Opportunity Commission (EEOC) or the California Department of Fair Employment and Housing (DFEH). The EEOC may be contacted through its website at www.eeoc.gov or by phone at 1-800-669-4000. The DFEH may be contacted through its website at www.dfeh.ca.gov or by phone at 1-800-884-1684.

All employees, including management, supervisory, and human resources, are expected to abide by this Policy. Disability discrimination, failure to accommodate, and retaliation in violation of this policy is grounds for discipline, up to and including termination of employment.

Notice to Employees of Policy Regarding Employees with Disabilities

This notice is to let you know of PAQ, Inc.'s policy with respect to employees with disabilities as part of its ongoing efforts to make sure that it provides all employees with an equal opportunity for employment at PAQ, Inc. and to emphasize PAQ, Inc.'s commitment to being in compliance with all laws prohibiting discrimination, harassment, and retaliation against qualified employees with disabilities.

Included with this notice is a copy of PAQ, Inc.'s revised policy, which is effective immediately. PAQ, Inc. is also providing additional information regarding the policy, the difference between leave under the federal Family Medical Leave Act (FMLA)/California Family Rights Act (CFRA) and leave as a disability accommodation, the process for requesting accommodations for disabilities, and who to contact if you have questions or complaints. If you have additional questions, please contact your Human Resources Manager.

How Do I Request an Accommodation?

If you need an accommodation to perform the essential functions of your job, contact your Human Resources Manager and let them know what accommodations you need. Your Human Resources Manager will discuss your accommodation request with you and will determine whether that accommodation can be provided without resulting in an undue hardship to PAQ, Inc.

As part of this process, you will be asked to provide PAQ, Inc. with medical documentation to medically verify any and all work-related limitations you may have and that, with or without an accommodation, you are capable of performing the essential functions of your job. You will need to provide any requested documentation to PAQ, Inc. within 20 days of the request. You will not be asked to divulge any specific medical condition or disability as part of this process.

If the accommodation you need is temporary time off work (leave), you must contact FMLA Source by calling (877) 462-3652, or by logging in to www.fmlasource.com. A leave of absence as an accommodation for a disability is not limited to any predefined period of time, but PAQ, Inc. will not provide an employee with an indefinite leave of absence.

If PAQ, Inc. is unable to provide you with the specific accommodation you are requesting, PAQ, Inc. will engage in an interactive process with you to determine if there are other accommodations available that would accomplish the same goal (i.e., permitting you to perform the essential functions of your job).

If you have additional questions about how to request an accommodation, please contact your Human Resources Manager.

Is Reasonable Accommodation Leave the Same as FMLA/CFRA Leave?

No, leave as an accommodation for a disability is not the same as leave under the FMLA or CFRA. Although an employee may be eligible for both, there are significant differences between the two.

The FMLA and CFRA provide eligible employees with up to 12 weeks of unpaid leave in a 12-month period for specific qualifying reasons. A list of the qualifying reasons for FMLA and CFRA leave can be found in your employee handbook. This leave can be taken all at once or

intermittently. To be eligible for FMLA/CFRA leave, an employee must have worked at least 1,250 hours during the 12 month period before the start of the leave.

An employee may be entitled to leave as a reasonable accommodation for a disability whether or not they otherwise qualify for FMLA/CFRA leave. In other words, employees do not need to have worked 1,250 hours in the preceding 12-month period in order to be qualified to take leave as a reasonable accommodation for a disability. Additionally, unlike leave under the FMLA and CFRA, leave granted as a reasonable accommodation is not limited to any specific length of time. However, indefinite leave or leave that would result in an undue hardship to PAQ, Inc. will not be provided.

An employee may qualify for leave under the FMLA and/or CFRA and also be entitled to leave as a reasonable accommodation. Under those circumstances, an employee would first utilize their FMLA/CFRA leave time. Once that leave is exhausted, any additional leave required by the disabled employee would then be granted as a reasonable accommodation, provided it does not create an undue hardship to PAQ, Inc.

If you require leave as a reasonable accommodation for a disability, please contact FMLA Source at (877) 462-3652 or log in to www.fmlasource.com. If you have additional questions about leave as a reasonable accommodation, please contact your Human Resources Manager.

Who Do I Contact If I Have Questions, Concerns, or Complaints Regarding Reasonable Accommodation Requests?

If you have any questions regarding the reasonable accommodation request process, please contact your Human Resources Manager. If you have any complaints about the process, feel that you have been improperly denied a reasonable accommodation, or believe that you have been retaliated against for requesting a reasonable accommodation, please immediately contact your Human Resources Manager. All questions, concerns, or complaints will be kept confidential to the fullest extent practicable.

You may also contact the federal Equal Employment Opportunity Commission (EEOC) or the California Department of Fair Employment and Housing (DFEH) if you have additional questions about reasonable accommodations or wish to file a complaint. The EEOC can be contacted through its website at www.eeoc.gov, or by phone at (800) 669-4000. The DFEH can be contacted through its website at www.dfeh.ca.gov or by phone at (800)-884-1684.