

## **GUIDANCE ON RELIGIOUS ACCOMMODATION IN THE WORKPLACE – US**

*The statement below is Leading Edge Pharms’s guidance on reasonable accommodation of the religious observances and practices of colleagues and applicants for employment. This guidance supersedes any and all prior guidance or policies on this subject that are inconsistent. This guidance is effective February 1, 2018 and applies to all United States based colleagues and to applicants for positions in the United States.*

### **Guidance Statement**

Leading Edge Pharms is committed to supporting equal opportunity for all colleagues and applicants for employment, without regard to race, color, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, disability or veteran status. As part of this commitment, Leading Edge Pharms will endeavor to provide a reasonable accommodation to the religious observances and practices of any colleague or prospective colleague, which are based on a sincerely held religious belief, unless such an accommodation would impose an undue hardship on the conduct of the Company’s business.

A reasonable accommodation is a change in the workplace or the way things are customarily done that enables a colleague or an applicant for employment to participate in his/her religious observance or practice without undue hardship to the Company’s business or operations. In determining whether a particular religious accommodation might pose an undue hardship, the Company may consider a variety of factors, including but not limited to: (a) business necessity; (b) financial costs and expenses; (c) resulting staffing concerns; and (d) resulting safety concerns. The Company will adhere to all applicable laws with respect to providing reasonable religious accommodation in the workplace.

No colleague or applicant who has requested or been granted a religious accommodation will be subject to retaliation for requesting or utilizing such accommodation.

### **Accommodation Process – Colleagues**

A colleague seeking a religious accommodation should bring the request to his/her manager and HR contact. Any manager who receives a request for a religious accommodation from a colleague is responsible for notifying his/her HR contact of the requested accommodation and any HR colleague who receives a request should notify the requesting colleague’s manager.

Upon receipt of a request for a religious accommodation, the manager and HR will engage in an interactive dialogue with the colleague in order to determine whether a reasonable accommodation can be provided, and may consult with others, as necessary. What constitutes a reasonable religious accommodation will be determined on a case by case basis, utilizing input from the colleague and the manager. Factors that may be considered in making this determination include, but are not limited to, the nature of the accommodation requested, the duration of the request, alternative accommodations, the financial impact of granting the accommodation, the impact on the operation of the department or unit, and the ability of the colleague to perform essential functions of the position if the accommodation is granted. As a result of and in furtherance of the interactive process, the determination may be to grant an alternative accommodation rather than the accommodation that was initially requested by the colleague.

Once a determination is reached as to a colleague's religious accommodation request, the colleague will be provided a completed Colleague Request for Religious Accommodation form that documents the requested accommodation, what accommodation has been provided, if any, and the parameters of that accommodation. After an accommodation is implemented, the colleague is responsible for advising the Company if the accommodation is not effective and should be reconsidered or if circumstances have changed and the accommodation is no longer needed or effective. The Company also may reconsider and discontinue any accommodation previously granted if it determines the accommodation is no longer needed, reasonable or effective, or if the continued accommodation poses an undue hardship to the business.

### **Accommodation Process - Applicants**

An applicant for employment seeking a religious accommodation in order to participate in the recruiting process should bring the request to Talent Acquisition (TA). Any manager who receives a request from an applicant for a religious accommodation in connection with the recruiting process is responsible for notifying TA of the requested accommodation. TA and the manager, as needed, will engage in an interactive dialogue with the applicant in order to determine if a reasonable accommodation to enable the applicant to participate fully in the application/interviewing process in a timely fashion can be provided. TA may consult with others, as necessary, to make a determination. Once a determination is reached as to an applicant's religious accommodation request, TA will provide to the applicant a completed Applicant Request for Religious Accommodation form that documents the requested accommodation and what accommodation has been provided, if any.

### **Additional Questions**

If there are questions regarding this Guidance document, please contact the Vice President of Human Resources.