

Notice Regarding Wellness Program

Apothicor Wellness is a voluntary wellness program available to all beneficiaries of [Company's Name]'s health plan. 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 choose to participate in the wellness program you will be asked to complete a voluntary health risk assessment or "HRA" that asks a series of questions about your health-related activities and behaviors and whether you have or had certain medical conditions (e.g., cancer, diabetes, or heart disease). You are not required to complete the HRA or other medical examinations.

Only beneficiaries who choose to participate in the wellness program are eligible to receive an incentive, which may differ dependent upon various categories and outcomes. Although you are not required to complete the HRA or other medical examinations, the aforementioned items are prerequisite for participation in the wellness program.

Incentives of up to thirty percent of [company's name]'s single only health plan coverage cost may be available for beneficiaries who participate in and/or achieve certain health outcomes. 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 may be entitled to a reasonable accommodation. You may request a reasonable accommodation by contacting Apothicor Wellness' privacy officer at contact@apothicor.com.

The information from your HRA and/or medical examination 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, such as disease management and medication therapy management. You also are encouraged to share your results or concerns with your own healthcare providers, at your discretion.

Protections from Disclosure of Medical Information

We are required by law to maintain the privacy and security of your personally identifiable health information. Although, the wellness program and your health plan may use aggregate information it collects to design a program based on identified health risks in the workplace, Apothicor Wellness will never disclose any of your personal information either publicly nor 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 wellness 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. Anyone who receives your information for purposes of providing you services as part of the wellness program will abide by the same confidentiality requirements. The only individual(s) who will receive your personally identifiable health information is (are) Apothicor Wellness' pharmacists and staff and your health care team, at your discretion (including primary and specialty providers and their staff), 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 personal 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. Nonparticipation in the wellness program will not result in any penalties, financial or otherwise, nor benefits of employment such as enrollment in the health plan, terms of employment or other fringe benefits.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact our privacy officer at contact@apothicor.com.