

ADAAA Accommodation Policy

Region/Country: United States**Effective Date:** June 9, 2023**Supersedes:** ADAAA Accommodation Policy**Dated:** October 22, 2020

Scope

Conduent Business Services, LLC and its subsidiaries provide this policy as a guide for Conduent managers, applicants, and associates as well as staffing firm business contacts and their workers. This policy applies to all applicants and associates of Conduent Business Services, LLC and its subsidiaries ("Conduent") and staffing firm workers assigned to Conduent who are based in the Region/Country identified above and any reference hereafter to Conduent is a reference to Conduent Business Services, LLC and its subsidiaries.

Summary

Conduent will make one or more reasonable accommodations for known physical and mental limitations of qualified applicants and associates consistent with applicable federal and state laws, such as the Americans with Disabilities Act (ADA), and the Americans with Disabilities Amendment Act (ADAAA). Further, consistent with the guidance issued by the Equal Opportunity Employment Commission, Conduent has established a process for Contingent Workers assigned to Conduent to be sure qualified individuals receive reasonable accommodations for known physical and mental limitations. Conduent is committed to a diverse and inclusive environment where everyone can bring their best selves to work.

Definitions

Contingent Worker: Individuals who are recruited, hired, and paid by a staffing firm, such as a temporary employment agency or contract firm, and assigned to work in roles supporting Conduent and its clients.

Disability under ADAAA: A physical or mental impairment that limits one or more major life activities. An associate may be considered disabled if they have a disability, have a record of such impairment, or are perceived as having such impairment. However, in all circumstances, Conduent can accommodate only when a disability is made known to the Company.

Interactive Process: A dialogue between an employer and an individual who has requested a reasonable accommodation, to help them work together to try to identify one or more possible reasonable accommodations and determine if one or more of them will effectively enable the employee to perform the essential functions of their job without placing an undue hardship on the employer. While Conduent expects staffing firms to handle accommodation requests from Contingent Workers, Conduent will support efforts and communications between the parties engaged in the Interactive Process, including its managers, its ADAAA team, Contingent Workers, and staffing agencies, as appropriate and as more fully explained below.

Reasonable accommodation: An adjustment to a job, schedule or work environment that enables a qualified individual with a known disability to perform the essential job functions of their job, and an applicant to successfully apply and/or test for a position without placing an undue hardship on the employer, and may include any of the following:

- Restructuring the non-essential functions of the job
- Implementing part-time or modified work schedules
- Re-designing work areas or equipment or providing adaptive technologies (for instance, adaptive technologies that would assist workers with hearing impairments)

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- Making facilities accessible
 - Providing reasonable periods of time off
 - Ensuring that all components of the application process are held in accessible locations
 - Providing readers or sign language interpreters

Retaliation: Any adverse action threatened or taken against an individual, to punish or discourage them from engaging in protected activity such as making an accommodation request, raising a complaint or concern under this policy, or cooperating and assisting with an internal or governmental audit or investigation regarding Conduent's accommodation policy or practices. Adverse action may come in different forms, but examples include disability discrimination, harassment, and wrongful termination.

Policy**I. Requesting an Accommodation and Engaging in the Interactive Process**

As part of the Interactive Process, Conduent will work with applicants, associates, management, and health care provider(s) to try to identify one or more reasonable and effective accommodations.

Even though Conduent is not the employer of Contingent Workers, Conduent will assist and cooperate with staffing firms and Contingent Workers who notify Conduent that an assigned Contingent Worker needs one or more reasonable accommodations to perform their job. The staffing firm will be primarily responsible for directly engaging in the Interactive Process with their Contingent Workers, including, but not limited to, requesting medical information to support accommodation requests, determining one or more possible reasonable accommodations, and maintaining any healthcare records related to requests. Once the staffing firm identifies one for more reasonable accommodations, the staffing firm will inform Conduent of its determinations. Conduent will review and take such action as may be necessary to implement the accommodations determined to be reasonable and effective by the staffing firm.

Conduent Applicants and Associates

Applicants and associates have some key responsibilities in enabling and facilitating the Interactive Process. Applicants and associates seeking a reasonable accommodation must:

- Demonstrate their qualifications to perform their job
- Be capable of performing the essential functions of the job
- Notify Conduent that an accommodation is needed for them to perform their job
- Provide all applicable supporting documentation needed by Conduent to determine whether one or more accommodations are needed, and if so, the nature and scope of the accommodation(s)

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- Actively participate in the Interactive Process, which includes considering alternative accommodations that can be changed to minimize the impact to Conduent.

For the Interactive Process to be productive, the applicant or associate must provide information about the nature of their disability and the accommodation, as requested and according to the timelines established. A qualified associate with a disability who needs an accommodation to perform the essential functions of their job must notify their manager. An associate or applicant does not have to explain their disability or provide any details about their medical condition to their manager or recruiter but should inform them of the difficulty they are having or will have and how an accommodation will assist them in performing their job.

Once an associate has notified management of their need for an accommodation, their manager will open an ADAAA claim by submitting a referral form to Conduent's internal ADAAA Team.

A qualified applicant with a disability who needs an accommodation to successfully apply for a position may open an ADAAA claim by submitting a request directly to the FTADAAA@Conduent.com address.

At any point from initiating the request for accommodation, through the Interactive Process and after receiving a reasonable accommodation, an applicant or associate can communicate with the Conduent HRADAA team directly.

- Associates should contact: HRADAAA@Conduent.com
- Applicants should contact: FTADAAA@Conduent.com

Contingent Workers

When a Conduent manager learns that a Contingent Worker needs an accommodation, the manager should assist and cooperate with the appropriate contact at the staffing agency engaging in the Interactive Process and identifying potential reasonable and effective accommodations. Requests can be made by the staffing firm or the Contingent Worker or when a Conduent manager observes or notices a disability and believes an accommodation may be needed. If the Conduent manager observes or notices a disability and believes an accommodation may be needed, the manager should immediately open a Staffing Firm Referral Form and submit it to Conduent's ADAAA Team at StaffingFirmADAAA@Conduent.com. Generally, the staffing firm manager should submit a Staffing Firm Referral Form to StaffingFirmADAAA@Conduent.com for any Contingent Worker who requests an accommodation. However, nothing in this policy prohibits a Contingent Worker from submitting an accommodation request for themselves to StaffingFirmADAAA@Conduent.com. If a Contingent Worker submits a request, Conduent will accept it and follow its processes to ensure the appropriate parties engage in the Interactive Process.

Conduent's internal ADAAA team shall confirm receipt of accommodation request or inquiry received through StaffingFirmADAAA@Conduent.com to the requesting party within five (5) business days with a confirmation

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email that will include information on how the requesting party can follow up on the request, and will include a contact email.

Although the staffing firm is primarily responsible for the Interactive Process with their Contingent Workers, Conduent will take whatever action may be necessary to ensure the Interactive Process takes place as required by law with respect to Contingent Workers' requests in the event the Staffing Firm fails to do so in accordance with their establish processes and procedures for accommodation requests.

If the Conduent manager determines that the staffing agency requires assistance regarding the requested accommodation, or if the manager has any questions regarding the requested accommodation, the manager should contact Conduent's ADAAA Team at StaffingFirmADAAA@Conduent.com for assistance. If a Conduent manager has any issues with any accommodation sought by a staffing firm for one of its Contingent Workers, the Conduent manager should get in touch with the People Manager Advisory (PMA) contact assigned to support their business unit for guidance.

Unless otherwise agreed to by Conduent, the cost of any special equipment or any other accommodations provided to Contingent Workers as an accommodation will be the sole financial responsibility of the staffing agency.

II. Temporary Accommodations

As soon as an associate, staffing firm or Contingent Worker makes a request or notifies Conduent of a need for an accommodation, Conduent tries to provide a temporary accommodation so that the person can work during the Interactive Process until a determination is made. The provision of a temporary accommodation is not a guarantee that the same or any other accommodation will be provided at the conclusion of the Interactive Process. Conduent managers are responsible for working with the associate, staffing firm or Contingent Worker to identify and provide an effective temporary accommodation if possible. Conduent managers should advise Conduent's ADAAA Group of any temporary accommodations.

III. Reasonable and Effective Accommodations

- A disabled applicant, associate or Contingent Worker is entitled to a reasonable and effective accommodation, which may not be the accommodation that the applicant, associate, or Contingent Worker requested or prefers.
- Through the Interactive Process, Conduent will work with the applicant or associate, their identified medical provider(s) and management to try to identify one or more reasonable and effective accommodations.
- Conduent's ADAAA Group and managers will coordinate and work with staffing firms to be sure reasonable and effective accommodations are provided to Contingent Workers.
- Conduent may periodically review granted accommodations under this policy to ensure that they are consistent with business necessity and that the underlying circumstances upon which the

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accommodations were granted have not changed. This may require individuals with accommodations to submit updated documentation from their medical provider.

IV. Health and Safety Considerations

- An accommodation is not reasonable or effective if it puts the applicant, associate, co-workers, Contingent Workers, or others, at risk or in danger.
- Similarly, Conduent may ask any associate or Contingent Worker or their staffing firm to demonstrate fitness for duty at any time if it appears that the associate or Contingent Worker cannot safely perform their job.
- This applies to all applicants, associates, and Contingent Workers, regardless of whether they have a demonstrated disability.

V. Non-Retaliation

Conduent does not tolerate Retaliation or threats of Retaliation in any form. Any associate who engages in Retaliation or threats of Retaliation in any form will be subject to disciplinary action, which could include termination of employment.

Any associate or non-associate who believes that they have been the subject of Retaliation should report their concerns immediately to their supervisor/manager (unless the supervisor/manager is the alleged to be the responsible for the Retaliation), or any other members of management, Human Resources, or the Company's Ethics Helpline.

Any associate or non-associate who has knowledge of disability discrimination directed at another associate or non-associate or has reason to believe that an individual performing work for Conduent has not been provided accommodations or that the Interactive Process has not occurred should report it through any of the same processes.

Any supervisor or manager who observes a violation of this policy or receives a complaint related to this policy, including observations of discrimination, harassment, or retaliation against a Contingent Worker, must report it immediately to Human Resources or the Company's Ethics Helpline. Any supervisor or manager who fails to report such violation or complaint will be subject to disciplinary action, which could include termination of employment.

VI. Interpretation

Conduent's interpretation of this policy is final. Conduent may amend, terminate, or vary from this policy, at any time and in any situation, in its absolute discretion.

Conduent Ethics Helpline – Contact our Ethics Helpline if you have questions or concerns about potential unethical conduct: www.conduent.com/ethicshelpline

Conduent Internal Use Only

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Revision History

Date	Description
06/09/2023	Update to include contingent worker process
10/22/2020	Update to include applicant process
01/01/2017	Initial Conduent policy