

Brazeway Employer-Sponsored Wellness Program

NOTICE REGARDING WELLNESS PROGRAM 2026

Kapnick Strive is a voluntary wellness program available to all employees, and spouses covered on a medical plan at Brazeway. 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 will also be asked to complete a biometric screening, which will include a blood test for the standard panel of tests to inform you of cholesterol, glucose, triglycerides, nicotine and other health indicators. Other identify potential catastrophic issues such as liver function, kidney function and other internal organ panel. The biometric information is collected by a certified team of phlebotomists and will be sent to their lab for testing. They DO NOT test for illicit drugs, HIV/AIDs or any type of hepatitis. You are not required to complete the HRA or to participate in the blood test or other medical examinations.

However, employees who choose to participate in the wellness program are eligible to receive an incentive. To become automatically incentive eligible, employees must receive a health score of 70 or above, increase their previous year health score by 5 points, or be a first-time participant. If an employee does not receive a health score of 70 or above OR improve their health score by 5 points from the previous year, they are eligible to enroll in Kapnick Strive's Reasonable Alternative Standard (RAS) coaching program. Completion of the RAS coaching program allows employees to become incentive eligible. Although you are not required to complete the HRA or participate in the biometric screening, only employees who do so will be eligible to receive the wellness incentive. Following your 2026 biometric screening, you may request an enrollment form for the RAS coaching program by contacting Kapnick Strive at strive@kapnick.com.

The information from your HRA and the results 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, such as working with a health coach. You also are encouraged to share your results or concerns with your own doctor.

Kapnick Strive's Wellness Program complies with the Americans with Disabilities Act (ADA). If you have a medical condition that makes it medically inadvisable for you to participate in the health screening or meet the health outcomes required to earn an incentive, you may be eligible for a reasonable accommodation or an alternative standard. To request assistance or more information, please contact Alexis Deters at alexis.deters@kapnick.com.

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 Kapnick may use aggregate information it collects to design a program based on identified health risks in the workplace, Kapnick Strive Wellness Program 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 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) a registered nurse, a doctor, or a 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. Your test results are kept in strict confidence and NEVER shared with your employer. The screening team as well is held to the same Federal HIPAA privacy standards and doctors and other health professionals. 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 your Wellness Coordinator, Alexis Deters at alexis.deters@kapnick.com.