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<b>Religious Accommodation Procedure</b>		

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### 1.0 **Purpose**

Constellis, LLC and its affiliates (the “Company” or “Constellis”) are committed to creating a work environment that is anti-discriminatory, anti-harassment, fair, diverse, ethical, and that values the contributions of all its employees and contractors. The purpose of this Procedure is to outline Constellis’ process related to requests for Religious Accommodations.

It is the policy of Constellis to comply with the spirit and intent of all federal and state laws concerning the employment of qualified persons requesting an accommodation in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (“EEOC”). Furthermore, it is our Company policy not to discriminate against qualified individuals requesting a Religious Accommodation with regard to any term or condition of employment, including, but not limited to, the application procedures, hiring, advancement, discharge, compensation or training.

However, oftentimes, the Company’s contracts mandate strict uniform and/or grooming standards. Ultimately, in these types of situations, the government customer is the ultimate decision maker with regard to whether a religious reasonable accommodation can be granted or if it would necessitate a waiver from these types of contract provisions. In such circumstances, the Company is committed to using available contractual avenues to seek the accommodation, but may not be able to grant the request.

## 2.0 Scope

This Procedure applies to all employees who seek an accommodation based on their religious beliefs or practices and applicable laws. The Company reserves the right to amend or modify this Procedure at its discretion in accordance with the requirements of applicable law or for any other lawful reason. Any employee having questions about this Procedure, affirmative action efforts, or violations of the Procedure should contact a manager in the Human Resources Department.

## 3.0 Definitions

As used in this Procedure, the following terms have the indicated meaning:

### 3.1 **Religion or Sincerely Held Belief:**

Constellis defines Religion based on the Title VII definition. It includes traditional, organized religions such as Christianity, Judaism, Islam, Hinduism, and Buddhism. It includes religious beliefs that are new, uncommon, not part of a formal church or sect, or only held by a small number of people. Title VII also protects employees or applicants from discrimination if they do not subscribe to a particular religious view, do not participate in a religious activity as a condition of employment, or otherwise represented as compulsory and/or are atheist.

Social, political, or economic philosophies or personal preferences are not "religious" beliefs under Title VII.

### 3.2 **Religious Accommodation:**

Any adjustment to the work environment that will allow an employee or applicant to practice his or her religion. The need for religious accommodation may arise where an individual's religious beliefs, observances or practices conflict with a specific task or requirement of the position or an application process. Accommodation requests often relate to work schedules, dress and grooming standards, or religious expression in the workplace

### 3.3 **Undue Hardship:**

A condition that is particularly burdensome with regard to the operations of the business.

## 4.0 Procedure

The Company will in good faith consider requests for and, as appropriate, provide reasonable accommodations for individuals requesting a Religious Accommodation to enable them to perform the essential functions of their job, unless doing so would pose an undue hardship to the Company. The Company will engage in an interactive dialogue with the employee to determine what, if any, reasonable accommodation could be provided based upon the individualized circumstances of the employee and the customer they support. The Company may not be able to provide the specific reasonable accommodation requested by an employee however, the Company will work in the best interest to provide an accommodation that would enable the employee to perform the essential functions of their job and continue to abide by his or her Religion or Sincerely Held Belief.

**4.1 Applicants:**

The company prohibits discrimination, harassment or retaliation against any applicant because of their Religion or Sincerely Held Belief in hiring, firing, and other terms and conditions of employment. An applicant who is a qualified individual requesting a Religious Accommodation will be given the same consideration for employment as any other applicant. The Company will reasonably accommodate individuals who apply for a position, unless doing so creates an undue hardship. Recruiters or ROSS personnel who hear from an applicant that they need a reasonable accommodation to complete the application process should contact Human Resources with any questions or requests for accommodation.

**4.2 Employees:**

The Company prohibits discrimination, harassment or retaliation against any employee because of their Religion or Sincerely Held Belief in hiring, firing, and other terms and conditions of employment. The Company will reasonably accommodate employees requesting a Religious Accommodation so that they can perform the essential functions of a job and continue to abide by his or her Religion or Sincerely Held Belief. Contact Human Resources with any questions or requests for accommodation.

When requesting an accommodation, employees must complete the Religious Accommodation Request Form. Upon completion, the requesting employee will submit the form to their immediate supervisor and Human Resources for review.

**4.3 Religious Authority Verification:**

The Company reserves the right to require the requesting employee to provide written substantiation of the requested religious accommodation from their religious authority such as, but not limited to, work schedules, dress and grooming standards, or religious expression in the workplace.

When appropriate, the Company may need permission from the requesting employee to obtain additional information. Any request will comply with applicable laws. All information received by the Company in connection with a request for accommodation will be treated as confidential and maintained in accordance with applicable laws.

**4.4 Supervisors:**

Supervisors of employees submitting a request for Religious Accommodation will review the request form and submit the request to his or her Director-level manager for review. The supervisor can provide a recommendation of determination based on the requested accommodation, evaluation of impact (if any) on operations. The Director is required to contact the Senior Director of Human Resources assigned to the particular business area impacted for review for determination of whether the accommodation request can be granted. If denied due to an undue hardship, the supervisor, Director and Senior Director of Human Resources should determine if any alternative reasonable accommodation exists that does not create an undue hardship. The CHRO must be notified of any denials and potential alternative reasonable accommodations prior to them being discussed with the employee.

Retaliation of employees for requesting religious accommodation is strictly prohibited.

**4.5 Human Resources:**

Human Resources will work with the employee requesting a Religious Accommodation along with their Supervisors to provide consultation and approval of accommodations. When necessary, Human Resources will consult with Legal.

**RELATED DOCUMENTS**

- Equal Employment Opportunity (EEO) Policy
- Dress Code Policy
- Religious Accommodation Form

**VERSION HISTORY**

	<b>Version</b>	<b>Version Date</b>	<b>Author</b>	<b>Description</b>
1	1.0	08/07/2020	Human Resources	Initial Version