

Accommodation Policy

1.0 Policy

AngioDynamics is committed to the fair and equal employment of people with disabilities. Reasonable accommodation is a key element of this non-discrimination policy. While many individuals with disabilities can work without accommodation, other qualified applicants and employees face barriers to employment in the absence of an accommodation process. It is the policy of AngioDynamics to reasonably accommodate qualified individuals with disabilities unless the accommodation would impose an undue hardship to the company. This policy is in accordance with the Americans with Disabilities Act "ADA" as amended, "ADAAA" and the Rehabilitation Act of 1973, as amended "Rehabilitation Act." Accommodations will be provided to qualified individuals with disabilities when such accommodations are directly related to performing the essential functions of a job, competing for a job, or the enjoyment of equal benefits and privileges of employment.

2.0 Scope

This policy applies to all applicants, current employees, and employees seeking promotional opportunities.

3.0 Definitions

<u>Disability</u>- For purposes of determining eligibility for a reasonable accommodation, a person with a disability is one who has a physical or mental impairment that materially or substantially limits one or more major life activities.

<u>Essential Functions</u>- Are the fundamental job duties of the position that the individual with a disability holds or desires to hold.

<u>Interactive Process</u>- An informal, interactive process designed to identify the precise limitations arising from the disability and potential reasonable accommodations that could overcome those limitations, if any.

Reasonable Accommodation - A modification or adjustment to a job, an employment practice, or the work environment that makes it possible for a qualified individual with a disability to enjoy an equal employment opportunity. Examples of accommodations may include acquiring or modifying equipment or devices; modifying training materials; making facilities readily accessible; modifying work schedules; and reassignment to a vacant position. However, there is no obligation to find or create a position as an accommodation. AngioDynamics is not required to lower quality or quantity standards as an accommodation; nor is it obligated to provide personal use items such as glasses or hearing aids. AngioDynamics is not required to reallocate essential functions of a job as a reasonable accommodation.

<u>Undue Hardship</u>- An undue hardship is an action that is unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature or operation of AngioDynamics.

4.0 Process

4.1 Reasonable Accommodation

AngioDynamics will make reasonable accommodations when necessary for qualified employees or candidates for employment with disabilities, as defined by applicable law. Reasonable accommodation applies to three aspects of employment: (a) to assure equal opportunity in the employment process, (b) to enable a qualified individual with a disability to perform the essential functions of a job; and (c) to enable an individual with a disability to enjoy equal benefits and privileges of employment.

4.2 Procedures

An employee who wishes to request a reasonable accommodation in order to perform the essential functions of his or her position can do so by informing their supervisor or Human Resources of the need for an accommodation. Requests for reasonable accommodation do not have to be in writing and can be requested using any other reasonable method of communication. Human Resources may request documentation of the individual's functional limitations to support the request. Any medical documentation must be collected and maintained on separate forms and in separate, locked files. There will be controlled access to medical information, allowing release only in extreme circumstances that require emergency medical treatment.

4.2.1 Candidates for Employment

If a candidate for employment requires a reasonable accommodation in order to complete the application process, he or she shall inform Human Resources of the need for an accommodation. Human Resources will discuss the needed accommodation and possible alternatives with the applicant. Human Resources will make a decision regarding the request for accommodation and, if approved, take the necessary steps to see that the accommodation is provided.

4.3 Interactive Process

When a qualified individual with a disability has requested an accommodation, AngioDynamics and the qualified individual shall participate in the following interactive process:

- A. Discuss the purpose and essential functions of the particular job involved. Completion of a step-by-step job analysis may be necessary.
- B. Determine the precise job-related limitation.
- C. Identify the potential accommodations and assess the effectiveness each would have in allowing the individual to perform the essential functions of the job.
- D. Select and implement the accommodation that is the most appropriate for both the individual and the employer. While an individual's preference will be given consideration, AngioDynamics is free to choose among equally effective accommodations and may choose the one that is less expensive or easier to provide.
- E. Human Resources will work with the employee to obtain technical assistance, as needed.
- F. Human Resources will provide a decision to the employee within a reasonable amount of time.
- G. If an accommodation cannot overcome the existing barriers or if the accommodation would cause an undue hardship on the operation of the business, the employee and Human

Resources shall work together to determine whether reassignment may be an appropriate accommodation. Human Resources will review undue hardships by considering the impact of the accommodation on the nature or operation of the business and Human Resources will provide a decision to the employee.

4.4 Appeals

Employees or applicants who are dissatisfied with the decision(s) pertaining to his/her accommodation request may file an appeal with the Human Resources Manager, within a reasonable period of time, for a final decision.

This policy does not constitute an employment contract or implied promise of any kind. The terms of this policy may be modified or eliminated by AngioDynamics at any time with or without notice.

AngioDynamics is committed to the principles of Equal Employment Opportunity and Affirmative Action because it is morally right and legally required. It is the obligation of each officer, manager, and supervisor to ensure all employment activities are conducted in an equal and equitable fashion, without regard to race, color, creed, religion, sex, age, national origin, marital status, citizenship, physical and mental disability, criminal record, sexual orientation, gender identity or expression, status as a disabled, special, recently separated or Vietnam era veteran, Armed Forces Service Medal veteran, other protected veteran, genetic information, predisposition or carrier status, status with respect to receiving public assistance, domestic violence victim status or any other characteristics protected under applicable law. Such activities include, but are not limited to: hiring, promotion, demotion, transfer, recruitment, advertising, layoff, discharge, rate of pay, and selection for training.

Drug Free Workplace/Equal Opportunity Employer Minority/Female/Disabled/Veteran