



# CVS Health Colleague Handbook

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# Our Purpose

To better serve our customers, clients and patients, and reinforce our company's reputation for excellence, each CVS Health colleague should understand why we are in business and how we conduct our business.

## **OUR PURPOSE**

Bringing our heart to every moment of your health.

# Heart At Work Behaviors™

## **Put people first**

We are customer obsessed.

## **Rise to the challenge**

We boldly innovate to care for our customers.

## **Join forces**

We unite around our goal of serving the customer.

## **Create Simplicity**

We design for our customers.

## **Inspire trust**

We work to earn the trust of our customers and colleagues by meeting our commitments and acting with integrity.

# Disclaimer/ At-Will Statement

Please Note: The contents of this handbook are guidelines and intended for informational purposes only. The information in the handbook is accurate as of the date first published, but the company may change the guidelines, policies, practices, working conditions or benefits described here at any time, with or without notice to the colleague. It shall be the obligation of the colleague to make sure he or she has a current understanding of the company's policies.

In addition to this handbook, the company maintains a code of conduct, written policies and other procedures and workplace rules. Colleagues are expected to read, understand and follow all of the various company materials that relate to

the colleague's position, and failure to do so may result in discipline, up to and including termination of employment. These company materials can be found on CVS Health's policy and procedure portal or can be obtained from a colleague's supervisor or Advice & Counsel.

No statement in this handbook is intended to be, or shall be considered, a binding contract between the company and the colleague. The company employs individuals on an "at-will" basis (with the exception of those covered by a written employment contract), which means that the employment may be terminated by the colleague or the company at any time, with or without notice or cause, and for any lawful reason. This handbook does not modify the at-will relationship in any way.

Lastly, nothing in this handbook is intended to, or shall be understood to, interfere with or limit any colleague's rights to under federal or state law, including but not limited to, colleagues' rights to engage in protected, concerted activity under the national Labor Relations Act.

# I. Welcome

Welcome to CVS Health! We are glad you have chosen to join us. In doing so, you accept an important responsibility – a commitment to our customers, colleagues and community. The rewards for accepting this responsibility go beyond a paycheck. You have the opportunity to be part of a winning team, to learn and grow, and perhaps, most important of all, to make a difference in the lives of those we serve.

Over the years, our company has distinguished itself by recruiting and hiring terrific colleagues who are energized by our compelling Purpose and Strategy and who live and model our Behaviors. We have achieved financial results that have enabled us to grow, become one of the most successful companies in America and we are proud of the growth opportunities it has created for so many of our colleagues. Our success has also enabled us to give back to the communities we serve.

This handbook is designed to explain what CVS Health expects from you, and what you may expect of CVS Health as we strive to provide world-class service to our customers, clients and patients. Take the time to review this handbook and keep it to refer to as needed. Talk to your supervisor or Advice & Counsel if you have questions.

We wish you a long and rewarding career with CVS Health.

## A. Who We Are and What Guides Us

Millions of times a day, close to home and across the country, we're helping people on their path to better health. We're reinventing pharmacy to have a more active, supportive role in each person's unique health experience and in the greater health care environment – from advice on prescriptions to helping manage chronic and specialty conditions to providing quality walk-in medical care and pharmacy benefits management.

Because we're present in so many moments, in ways that are more affordable and effective, we're able to positively influence health behavior and shape the future of health care for people, businesses and communities. Health is everything.

While we are proud of our impressive growth in sales and earnings, we are even more proud of the talented and dedicated team that has driven our success. With our great colleagues, financial strength and unique business model, we are in a terrific position to meet the needs of those we serve, now and in the future.

As an industry leader, however, we must continually innovate and commit to continuous improvement across all of our business areas. Our future is bright as we open new doors to customers, new markets and new opportunities for every CVS Health colleague — including you.

## B. CVS Health People: Our Prescription for Success

Our colleagues are among our most valuable assets. Stores and products don't satisfy customers — people do. CVS Health calls its employees "colleagues" to recognize the fact that all of our workers, regardless of their role or level, are partners in our company's success. Each CVS Health colleague plays an important part in delivering the kind of service that keeps our customers coming back.

What makes our colleagues special? Successful CVS Health colleagues make a special effort to connect with our customers, clients and patients. They strive to be friendly and helpful, treating each individual with respect and interacting with them on a personal level — one at a time. This extra measure of service creates satisfied and loyal CVS Health customers.

## C. CVS Heart At Work Behaviors

Heart At Work provides every colleague and leader at CVS Health with purposeful and observable behaviors to support how we all work together to transform health care. The Heart at Work Behaviors are designed to enable the delivery of our strategy and accelerate business performance. Defining these behaviors provides clarity and empowers colleagues to confidently work both independently and within their teams. These behaviors, common across every level of our company, provide a sense of unity and belonging for all.

### **Put people first**

**We are customer obsessed.** We walk in others' shoes to improve the customer and colleague experience. We create an engaging and inclusive work environment where our colleagues reflect the diversity of our customers.

### **Rise to the challenge**

**We boldly innovate to care for our customers.** We act swiftly and adapt to feedback. We think big and are willing to take smart risks to innovate. We welcome different points of view and learn from mistakes.

#### **Join forces**

**We unite around our goal of serving the customer.** We work across teams to provide the best care possible. We listen and learn from each other. We are conscious of our impact on customers, colleagues and the company.

#### **Create Simplicity**

**We design for our customers.** We continuously simplify by removing extra steps and innovating to create streamlined solutions. We focus on what matters most to our customers and empower those colleagues closest to the work to make the right call.

#### **Inspire trust**

**We work to earn the trust of our customers and colleagues by meeting our commitments and acting with integrity.** We bravely do the right thing, even when it is hard. We speak up to challenge ideas and do so with heart.

## **D. Treating Each Other With Respect**

At CVS Health, you will encounter people with many backgrounds and perspectives. Meeting and getting to know your colleagues and customers is one of the most rewarding aspects of working at CVS Health. Our customers routinely go out of their way to call and write us to compliment our colleagues for the way we treat them.

Our newest colleagues routinely tell us that our warm, friendly people make us stand out from other places they have worked. As a new colleague, you are expected to treat all customers and colleagues with respect. It is an important part of your role and our Behaviors at CVS Health. Respect simply means being considerate, courteous and responsive whenever possible.

Making CVS Health a great place to work is also part of everyone's job. We work together to create an engaging working environment for every team and in every location. It brings out the best in each of us and makes work more fun. This helps us continue to attract the best talent and to build customer loyalty.



## II. Our Commitment to You

## **A. Diversity Management**

At CVS Health, we are committed to building an environment of inclusion and acceptance that values diversity across all areas of our business. Your role in creating and supporting an inclusive environment is to demonstrate respect for your colleagues and customers, and the broad range of ideas and viewpoints they contribute to our organization every day.

CVS Health offers a number of programs to support our commitment to diversity management. For more information on these opportunities, please contact your supervisor or Advice & Counsel.

## **B. Anti-Discrimination, Anti-Harassment, & Anti-Retaliation**

### **1. Unlawful Discrimination**

CVS Health is committed to the principle of equal employment opportunity and takes affirmative action to recruit, hire, employ, develop, compensate, promote and advance in employment based on an individual's job-related qualifications, abilities, and job performance. In addition, CVS Health prohibits discrimination against applicants and colleagues on the basis of race, ethnicity, ancestry, color, religion, sex/gender (including pregnancy, pregnancy related condition or condition related to childbirth), national origin, sexual orientation, gender identity or expression, physical or mental disability, medical condition, age, veteran status, military status, marital status, genetic information, citizenship status, unemployment status, political affiliation, or on any other basis or characteristic prohibited by applicable federal, state or local law. This policy applies to all terms and conditions of employment including but not limited to hiring, compensation, benefits, promotion, job assignments, demotion, transfer, training, and termination. It is our policy to recruit, hire, train, develop and promote the best people available, based solely upon job-related qualifications. Additionally, CVS Health is committed to complying with the Americans with Disabilities Act by prohibiting discrimination against applicants and colleagues with disabilities and by making reasonable accommodations that allow disabled individuals to perform the essential functions of their jobs and enjoy equal access to the benefits and privileges of employment with our company. Information regarding CVS's Reasonable Accommodation processes and procedures is provided in greater detail in this Handbook.

### **2. Workplace Harassment**

CVS Health strictly prohibits harassment on the basis of race, ethnicity, ancestry, color, religion, sex/gender (including pregnancy), national origin, sexual orientation, gender identity or expression, physical or mental disability, medical condition, age, veteran status, military status, marital status, genetic information, citizenship status, unemployment status, political affiliation, or on any other basis or characteristic prohibited by applicable federal, state or local law. Engaging in workplace harassment will result in disciplinary action, including immediate termination of employment.

Harassment of a team member by a manager/supervisor, by another team member, by a customer, by a vendor or by anyone associated with CVS Health

can take many forms. Inappropriate physical contact, threats, displaying vulgar objects, offensive jokes or comments, creating an uncomfortable work environment, or any other harassing behavior, whether written or otherwise transmitted or conveyed (e.g., in person, in a letter or a note, via email, or via social media), are all forms of harassment. Harassment can take place inside the workplace, any place where CVS Health work is performed, or outside the workplace during non-working hours.

Harassment that is prohibited by this policy may also include acts of Workplace Violence committed by managers/supervisors, colleagues, contractors, visitors, patients, or vendors, if those acts are perpetrated based on colleague's race, ethnicity, ancestry, color, religion, sex/gender (including pregnancy), national origin, sexual orientation, gender identity or expression, physical or mental disability, medical condition, age, veteran status, military status, marital status, genetic information, citizenship status, unemployment status, political affiliation, or on any other basis or characteristic prohibited by applicable federal, state or local law.

### **3. Workplace Sexual Harassment**

CVS Health strictly prohibits and will not tolerate sexual harassment in the workplace. Sexual Harassment is illegal. The company firmly believes that every colleague is entitled to a work environment free of offensive conduct of a sexual nature, regardless of its form or manner. The company recognizes that sexual harassment in the workplace negatively impacts colleague morale, trust, communication, teamwork and productivity, and creates legal liabilities for the company, its supervisors, and, in some cases, its colleagues.

Sexual harassment consists of sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature either explicitly or implicitly when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; and
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or altering the terms and conditions of the individual's employment by creating an intimidating, hostile or offensive working environment.

Specific behaviors and particular patterns of behavior that the company considers inappropriate (and which could potentially constitute unlawful sexual harassment) include, but are not limited to, the following:

- Attempted or actual sexual assault;
- Inappropriate touching of any kind;
- Propositions or any sexual advance that is unwelcome;
- Sexually oriented comments about a colleague's body or appearance;
- Sexual innuendos, derogatory remarks, sexually obscene language or offensive gestures, threats, comments about a colleague's body or appearance made in person, through email or other written communication, or through social media postings;
- Improper questioning of a colleague about their personal or private life;
- Comments or jokes of a lewd, offensive or sexual nature;
- Spoken or written abuse related to a colleague's gender;

- Inappropriate staring or leering;
- Gender-related names, titles or references;
- Showing or displaying pictures, drawings or objects of a sexual or offensive nature;
- Repeatedly asking a colleague for a date, after the colleague has said “No”; or
- Any other sexual conduct deemed inappropriate by CVS Health that interferes with a colleague’s job performance, the work environment or other conditions of employment.

Sexual harassment can involve males or females being harassed by members of either sex. Sexual harassment can occur in the workplace, anywhere CVS Health work is performed, or outside the workplace during non-working hours. Sexual harassment can be perpetrated by managers, supervisors, co-workers, and third parties, such as customers and vendors. All colleagues are strictly forbidden to engage in any form of sexual harassment and will be disciplined, up to and including immediate termination of employment.

#### **4. Retaliation**

CVS Health prohibits retaliation against a colleague for filing or pursuing a discrimination, workplace harassment, or sexual harassment claim in good faith, or for participating in good faith in an investigation of a prohibited discrimination, workplace harassment or sexual harassment claim (“protected activities”). Retaliation occurs when an employer takes an adverse action against an individual because they have engaged in a protected activity or they have a close association with someone who has engaged in such protected activity. Adverse actions include termination, refusal to hire, denial of a promotion, harassment or other action that negatively affect employment such as undesirable job assignments, threats, unjustified negative evaluations, or increased surveillance. Retaliation by colleagues can take the form of a retaliatory hostile work environment. Any colleague who engages in retaliation will be subject to disciplinary action, up to and including immediate termination of employment.

#### **5. Reporting Conduct**

Colleagues are expected to report incidents of inappropriate behavior, prohibited discrimination, workplace or sexual harassment, and retaliation as soon as possible after it has occurred.

Colleagues who believe they have witnessed or have been subjected to unlawful discrimination, harassment, or retaliation regardless of whether the offensive act was committed by a manager, supervisor, coworker, vendor, visitor or customer, should promptly notify their manager/supervisor, or Advice & Counsel. Colleagues may contact Advice & Counsel by calling 888-My-HR-CVS (888-694-7287) as well as the CVSHealth Ethics Line at 1-877-CVS-2040 (1-877-287-2040) at any time to report any incidents of prohibited discrimination, harassment, or retaliation.

It is hoped that most complaints of this nature and incidents can be resolved within CVS Health. However, a colleague has the right to contact their state fair employment practices agency or the U.S. Equal Employment Opportunity Commission (EEOC) about filing a formal complaint.

The contact information for the various state fair employment practices agencies and the local offices of the Equal Employment Opportunity Commission, along with additional information for filing such a complaint, is included in CVS Health's separate Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy.

## **6. Investigations**

Every claim of prohibited discrimination, harassment, and retaliation will be treated seriously, no matter how trivial it may appear. All complaints of inappropriate conduct will be promptly and thoroughly investigated by Advice & Counsel and/or the respective department manager. Colleagues are expected to cooperate fully with any ongoing investigation.

To the extent possible, the company will keep all complaints and related information confidential.

Management will take all necessary and reasonable steps to ensure the safety of those who are affected by or involved in the alleged behavior.

Colleagues who believe they have been unjustly charged with prohibited discrimination, harassment, or retaliation may defend themselves verbally or in writing at any stage in the investigation.

At the conclusion of an investigation, the complainant and the accused shall be informed of the determination of the investigation. Where appropriate, the complainant and the accused may be offered counseling through the company's Employee Assistance Program (EAP).

## **7. Consequences for Violation of Prohibited Discrimination, Workplace Harassment, Sexual Harassment, and Retaliation Policy**

If an investigation determines that an individual has engaged in conduct that constitutes prohibited discrimination, workplace harassment or sexual harassment, retaliation or otherwise violates the CVS Health standards of behavior, necessary corrective discipline up to and including termination will be taken by the company.

If after investigating any complaint of harassment, prohibited discrimination, or retaliation, CVS Health determines that the complaint was made maliciously or that a colleague has maliciously provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave the false information.

## C. Open Door and Problem Solving

CVS Health strives to create a working environment in which everyone can communicate freely.

We encourage you to speak honestly and constructively to your supervisors and managers about your work-related concerns. The company will treat your questions, concerns, and complaints seriously and address them in a timely manner.

When you have a work-related question or concern, it is best to discuss the issue first with your immediate supervisor. Your supervisor is most familiar with your job and working environment and may be able to give you advice, help you to understand a difficult situation, and advise you on next steps.

There may be situations, however, where you are not comfortable discussing the issue with your supervisor or where you require further assistance. When those situations arise, we recommend that you follow the steps in the CVS Health Problem Solving/Issue Resolution Process below.

### CVS Health Problem Solving/Issue Resolution Process:

If	Then
You have a question, problem or issue ...	... inform your immediate supervisor or manager.
You have a routine benefit/payroll/leave of absence issue that has not been resolved by your immediate supervisor ...	... call myHR at 888-694-7287.
You are not comfortable with this approach, or your immediate supervisor cannot or does not resolve your question, problem or issue satisfactorily...	...you may contact your next-level leader.
You are not satisfied with the outcome after speaking with your next-level leader...	... you may contact Advice & Counsel by calling myHR at 1-888-694-7287 and follow the prompts for Advice & Counsel

## D. CVS Health Ethics Line

In the event you think you have observed violations of the Code of Conduct, company policies, unethical conduct, illegal behavior, unsafe conditions or any violation of applicable law and/or regulations, including but not limited to state pharmacy laws, we urge you to discuss this with your immediate supervisor and continue your inquiry “up-the-ladder” until you feel you have received an

appropriate response. If a question or concern cannot be readily addressed within your work group or through your supervisor, you have the option to contact the CVS Health Ethics Line at 1-877-CVS-2040 (1-877-287-2040).

The Ethics Line is available 24 hours per day, 7 days per week, 365 days per year. When you contact the Ethics Line, you will be treated with dignity and respect. All calls will be treated in a highly confidential manner to the extent the company deems possible. You do not have to identify yourself. Caller ID is not used, and an independent third party handles all calls placed to the Ethics Line. The company is fully committed to its non-retaliation policy meaning that the company prohibits retaliation against anyone for raising a legal or ethical concern in good faith or for cooperating with an investigation.

If you call the Ethics Line anonymously, you will be given a unique identification number so that you can call back for a status report on your call. The company is committed to responding to all reports and will investigate all good faith reports of wrongdoing. Based on the findings of the investigation, the company will address any perceived and actual ethical or business conduct issues. In the event you identify yourself, but do not want your name revealed further, CVS Health will protect your identity to the extent reasonably possible.

Please refer to the Resource Guide at the end of this Handbook for contact numbers and additional information. You can also consult the CVS Health intranet site.

## **E. My EAP, Solutions for Everyday Life**

CVS Health colleagues and household family members can access My EAP, the employee assistance program from Aetna Resources for Living, for access to an array of services. From child and elder care referrals, to pet sitters and home maintenance services, My EAP can bridge the gap between worry and peace of mind to help you live better at work and at home.

In addition, colleagues and household family members benefit from six face-to-face counseling sessions per person, per issue, per year. Provided by licensed mental health professionals, this service is available to you and your family even if you're not enrolled in a CVS Health medical plan.

My EAP services also include, but are not limited to:

- Behavioral health
- Autism Family Support program
- Legal assistance (e.g., family law, probate matters, separation/divorce)
- Daily living (e.g., fitness and nutrition, relocation services, pet sitters)
- Financial assistance (budgeting, debt consolidation, identity theft recovery)

My EAP is available 24 hours a day, seven days a week by calling 800-789-8990 or by visiting on at **[www.myeapCVSHealth.com](http://www.myeapCVSHealth.com)**.

## **F. Reasonable Accommodation**

CVS Health is committed to providing all colleagues with the opportunity to enjoy a fulfilling work experience and removing barriers that may deny individuals that opportunity as a result of a disability, religious belief, pregnancy or childbirth

related conditions, domestic violence, or other safety related situations. As described below, CVS Health will provide reasonable accommodations to eligible colleagues in accordance with applicable law.

Colleagues seeking an accommodation for pregnancy, pregnancy related conditions, or conditions related to child-birth, including lactation accommodations, should reference the CVS Health Pregnancy and Lactation Non-Discrimination and Accommodation Policy outlined in this Handbook. An accommodation is any change to the job application process, job duties, work environment or conditions that will allow the colleague or applicant: to have an equal opportunity to compete for a job; to perform the essential functions of a job; or to enjoy equal access to the benefits and privileges of employment. An accommodation is considered “reasonable” if it enables the colleague to perform the essential functions of their job and does not impose an undue hardship on CVS Health.

**Eligibility for Accommodation:** A colleague or applicant, who has a disability (as defined by applicable law), may be eligible for a reasonable accommodation in order to enjoy equal access to the benefits and privileges of employment, to complete the job application/hiring process and to perform the essential functions of their job. In addition, a colleague or applicant whose sincerely held religious belief, practice or observance conflicts with a work requirement or a colleague who themselves or their family member is facing a domestic violence or other safety related situation may also be eligible for a reasonable accommodation. A colleague or applicant with questions about their individual situation and whether it is covered should contact Advice & Counsel.

**Some Examples of What May be Reasonable Accommodations:** The determination of what is and is not a reasonable accommodation and what presents an undue hardship depends greatly on the specific facts of each request. An accommodation that is made for one colleague or applicant in one location or area of the business may not be made for another colleague or applicant in another location or area of the business, even though they have the same disability and title. Some examples of possible reasonable accommodations include the following:

- Altering how or when job duties are performed;
- Modifying work schedules, and time off for religious holidays or other religious observances;
- Reassigning or removing non-essential job duties;
- Providing assistive equipment, devices or technology; qualified readers or interpreters
- Modifying job training and tests;
- Reconfiguring work spaces, provide seating, and improve physical accessibility;
- Providing ergonomic evaluations and modified equipment;
- Work from home on either a full-time or part-time basis;
- Lifting assistance, additional time off, modified seating and equipment, additional rest breaks, or more frequent restroom, food and water breaks for pregnant colleagues;
- Time and appropriate space for scheduled prayer;
- Time off for medical appointments, finite intermittent leave of absence or a finite continuous leave of absence;
- Providing an exception to the dress code; and



- Transferring the colleague to another open position for which they are qualified.

**Some Examples of What Will Not be Reasonable Accommodations:**

The Company is not expected to provide an accommodation that would be an undue hardship. Generally, CVS will not be expected to accommodate a colleague or applicant by:

- Removing essential functions of the job;
- Lowering production or performance standards;
- Hiring another individual to assist the colleague or applicant;
- Providing unlimited or indefinite leave;
- Terminating or changing the position of other colleagues;
- Creating a new position for the colleague or applicant;
- Deleting past discipline or negative performance reviews;
- Allowing working conditions that create a direct threat of harm to the colleague or others; or
- Purchasing personal aids for the colleague or applicant, such as a wheelchair that will be used in and out of work.

**Requesting an Accommodation:** Eligible colleagues or applicants are expected to let CVS Health know when they think they might need a workplace accommodation under this policy. Colleagues or applicants should not assume that, if CVS Health is aware that the colleague or applicant has a certain disability, medical condition, or belongs to a particular religion, that the Company will know exactly how the colleague or applicant may be limited at work. To request an accommodation during hiring, job applicants should contact the hiring manager for their opening or anyone in the Talent Acquisition department. Current colleagues who want to make an accommodation request can discuss their request with their manager and should contact myHR by calling 1-888-694-7287 and follow the prompts for Leave of Absence/Reasonable Accommodations, or apply at myHR.cvs.com and select myLeave to initiate a request. The request can be in writing or verbal, and there are no “magic words” that colleagues or applicants need to use. To help ensure a prompt response, however, colleagues or applicants should make it clear that they want to request a possible workplace accommodation as a result of their disability or religion.

**Interactive Process:** Once the request is made the CVS Health Reasonable Accommodations Team will begin the “interactive process,” which refers to the back-and-forth discussion between CVS Health and the colleague or applicant regarding the colleague or applicant’s request. The process is flexible and may be more or less involved depending on the complexity of the colleague or applicant’s request, but the process often begins with a discussion with the colleague or applicant where the Reasonable Accommodations Team member may ask questions to better understand the colleague or applicant’s limitations and the accommodations that may or may not help the colleague or applicant.

**Requests for Medical Information or Other Supporting Documentation:** As part of the interactive process, the colleague or applicant may be asked to provide information, including medical documentation from a health care provider, to substantiate and explain the colleague or applicant’s limitations, how those limitations impact the job and what accommodations may help. The colleague or applicant must provide all requested information and complete requested forms in a complete and timely fashion. If the colleague or applicant

does not provide sufficient information, CVS Health may not be able to continue with the interactive process, and no accommodation can be granted.

**Timeframe for Review of Request:** CVS Health will work hard to complete the accommodation request review process as quickly as possible. In most cases, once the colleague or applicant has provided the necessary information, the company should be able to respond with a decision within a couple of weeks or less. If more time is needed, the colleague or applicant will be updated. Whether a temporary accommodation will be put into place on an interim basis while the accommodation request is pending will depend upon the circumstances.

**Determination by CVS Health:** Once CVS Health has reached a decision regarding the accommodation request, the Reasonable Accommodations Team member will communicate the decision to the colleague or applicant. If the request is granted, the accommodation will be put into effect going forward. If the request is denied, the Reasonable Accommodations Team member will confer with the colleague or applicant regarding any other accommodations that either party can think of to consider. Colleagues and applicants are not entitled to the specific accommodation that he or she requests. CVS Health may choose among reasonable accommodations as long as the chosen accommodation is effective.

**Modification or Change of Circumstances:** The interactive process is meant to be an on-going dialogue between the colleague or applicant and CVS Health. No reasonable accommodation that has been granted by CVS Health is ever considered permanent. For example, if business related circumstances or the needs of the Colleague change, which then that impacts a requested or granted accommodation, the parties may revisit and review the accommodation.

**Confidentiality:** CVS Health recognizes that the information provided by the colleague or applicant in connection with an accommodation request is often very sensitive, and the company will treat all information received with appropriate discretion and care in accordance with company policy and applicable privacy laws. Any accommodation-related records that contain medical information will be handled like other colleague medical records and kept confidential and separate from the colleague's regular personnel file.

**Prohibition Against Discrimination and Retaliation:** CVS Health prohibits all forms of discrimination and retaliation against any individual for requesting or receiving an accommodation. If an individual believes that he or she has been discriminated or retaliated against in violation of this rule, he or she should report the matter immediately to a manager or Advice & Counsel.

For additional information on this topic please see CVS Health's Reasonable Accommodations in the Workplace policy.

## **G. Pregnancy and Lactation Non-Discrimination and Accommodation**

**Prohibition Against Discrimination and Retaliation.** CVS Health prohibits all forms of discrimination and retaliation against any individual who is pregnant, has a pregnancy related condition, or a condition related to childbirth, including those who request accommodations. If a Colleague believes that she has been discriminated or retaliated against in violation of this rule, she should report the matter immediately to a manager, Advice & Counsel, or a Reasonable Accommodation representative. Finally, it is against CVS Health's policy to

retaliate against anyone who has filed a complaint or cooperated in the Company's investigation of such a complaint, pursuant to this policy.

**Eligibility for Accommodation.** Colleagues have a right to request accommodations for pregnancy, pregnancy-related conditions or conditions related to childbirth (e.g., lactation accommodation). Reasonable accommodations will be provided unless they impose an undue hardship as determined by applicable law. The determination of what is a reasonable accommodation and what presents an undue hardship depends on the specific facts of each request.

**Requesting an Accommodation.** As outlined above, colleagues should inform CVS Health as soon as possible when they think they might request a workplace accommodation under this policy. To request an accommodation, the Colleague should contact Advice & Counsel, Reasonable Accommodations (1-877-805-9511, option 1 for Reasonable Accommodations), 45 days prior to the need for the accommodation, or as soon as practicable. Please see Reasonable Accommodation, Section F., of this Handbook for further details regarding the interactive and determination processes.

- a. **Accommodations for Pregnancy, Pregnancy-Related Conditions, and Conditions Related to Child-birth.** The determination of what is a reasonable accommodation and what presents an undue hardship as determined by applicable law depends on the specific facts of each request. Some examples of possible reasonable accommodations include: more frequent restroom, food and water breaks; modified work schedules and work duties; additional rest breaks; limits on physical duties such as lifting; modified seating and equipment; job restructuring, light duty work if available; temporary transfer to less strenuous or less hazardous position; time off for medical appointments, full-time or part-time work from home, reduced work schedules; or a leave of absence.
  - i. **Lactation-Related Accommodation to Express Milk at Work.** Requests for lactation time and access to a designated space, as defined under applicable state/local laws, will be assessed upon request. What is considered reasonable will depend on the Colleague's job function, business unit, and location. Lactation Breaks: Whenever possible, lactation breaks should be taken during regularly scheduled breaks. Additional lactation breaks and/or lactation breaks that are not taken during regularly scheduled breaks may be provided unless it is an undue hardship as determined by applicable law. Lactation breaks that are in addition to regularly scheduled breaks may be unpaid for non-exempt Colleagues. If needed and the opportunity is available, Colleagues may request schedule adjustments to allow for lactation breaks, such as working before or after their normal shift to make up any time used during unpaid break time for the expression of breast milk.
- b. Lactation Location/Space: Wellness rooms are available for expressing milk in some locations. Under some circumstances, temporary lactation locations may be created where other means of

private space cannot be made. Where a private space is provided to a nursing mother is also used for other purposes (e.g., break rooms, multi-use wellness rooms, etc.), the location may only be used for lactation purposes when a Colleague is using the location for expressing milk. The location's lactation purpose will take precedence over all other functions and uses. In the event more than one individual needs access to the lactation room at the same time, a Colleague may request assistance from her immediate leader or call Advice & Counsel, Reasonable Accommodations (1-877-805-9511, option 1 for Reasonable Accommodations) for assistance coordinating access. **Determination by CVS Health.** Once CVS Health has reached a decision regarding the accommodation request, the manager or Reasonable Accommodations representative will communicate the decision in writing to the Colleague or Applicant. If the request is granted, the accommodation will be put into effect going forward. If the request is denied, the manager or reasonable accommodation representative will confer with the Colleague or Applicant regarding other accommodations that may be effective.

#### EXHIBIT 1: STATE AND CITY MANDATED additional Pregnancy and Lactation Requirements

Baltimore, MD	Any variance or waiver provided to CVS Health regarding lactation accommodations will be described in writing. Colleagues who believe that they have been retaliated against can file a complaint with the Baltimore Community Relations Commission
Illinois	During the first year after the birth of the child, no reduction in pay for additional lactation breaks, that are reasonable and not an undue hardship
New York City, NY	Reasonable break time for a Colleague to express breast milk provided pursuant to section *206-c of the NYC labor law. Colleagues may elect to make up for unpaid time before or after their shift as long as the additional time falls within the Company's standard operating hours
California	Reasonable break time and appropriate location must be provided each time the employee has need to express milk. Additional break time for non-exempt employees will be unpaid. Colleagues who are not provided reasonable break time or appropriate space may be eligible to receive one hour of Lactation Penalty Pay and should contact their managers. Colleagues have the right to file a complaint with the Labor Commissioner if they believe a violation of the lactation accommodation rights has occurred

## H. Leaves of Absence

The overall well-being of colleagues is important to CVS Health. The company recognizes that there are times when colleagues need to take time off from work to address personal matters, care for loved ones, perform military duty and for other reasons. The company is committed to providing colleagues with all leave guaranteed by applicable federal, state and local laws, such as the Family and Medical Leave Act ("FMLA"). In addition, the company provides other leaves of absences for which a colleague may be eligible depending on the type of leave sought and whether the colleague meets the leave eligibility requirements.

For more information about the types of leaves of absence for which colleagues may be eligible, go to [myHR.cvs.com](https://myHR.cvs.com) and select the myLeave link or call myHR at 1-888-694-7287 and follow the voice prompts to Leave of Absence.

## I. Family and Medical Leave Act (FMLA) Leaves of Absence

**Eligible Colleagues:** Colleagues working in United States and Puerto Rico locations are eligible to take unpaid, job protected leave under the FMLA if they: (1) have worked for the company for at least 12 months, and for at least 1,250 hours within the last 12 months, and (2) are employed at a worksite that employs 50 or more people within a 75 mile radius.

**Basic Leave Entitlement:** Eligible colleagues may take up to 12 weeks of unpaid, job-protected FMLA leave within a rolling 12-month period, measured backward, for any of the following reasons: (1) for incapacity due to pregnancy or prenatal care; (2) the birth of a child or placement of a child for adoption or foster care; (3) To care for the colleague's spouse, child, or parent who has a qualifying serious health condition; and (4) For the colleague's own qualifying serious health condition that makes the colleague unable to perform the colleague's job. If both spouses work for the company and leave is taken for the foster placement, adoption or birth of a child, or to care for a parent with a serious health condition, the maximum combined FMLA leave for both spouses for such reasons is 12 weeks in any rolling 12-month period, measured backward.

**Definition of Serious Health Condition:** A serious health condition is defined as an illness, injury, impairment or physical or mental condition that involves:

- Any period of incapacity or treatment connected with inpatient care (i.e., an overnight stay in a hospital, hospice, or residential medical care facility); or
- A period of incapacity requiring absence of more than three calendar days from work, school, or other regular daily activities that also involves continuing treatment by (or under the supervision of) a health care provider; or
- Any period of incapacity due to pregnancy, or for prenatal care; or
- Any period of incapacity (or treatment therefore) due to a chronic serious health condition (e.g., asthma, diabetes, epilepsy, etc.); or
- A period of incapacity that is permanent or long-term due to a condition for which treatment may not be effective (e.g., Alzheimer's, stroke, terminal diseases, etc.); or,
- Any absences to receive multiple treatments (including any period of recovery therefrom) by, or on a referral by, a health care provider for a condition that likely would result in incapacity of more than three

consecutive days if left untreated (e.g. chemotherapy, physical therapy, dialysis, etc.)

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three consecutive calendar days combined with at least two visits to a health care provider, or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

**Military Family Leave Entitlements:** Eligible colleagues whose spouse, son, daughter or parent is on covered active duty or called to covered active duty status may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include issues arising from the military member's short notice deployment, military events and related activities, childcare and related activities, activities related to care of a military member's parent, financial and legal arrangements, counseling sessions, rest and recuperation and post-deployment activities.

FMLA also includes a special leave entitlement that permits eligible colleagues to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is: (1) a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness\*; or (2) a veteran who was discharged or released under conditions other than dishonorable at any time during the five-year period prior to the first date the eligible colleague takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness.\*

\*The FMLA definition of "serious injury or illness" for current service members and veterans are distinct from the FMLA definition of "serious health condition".

**Notice of Leave:** If the colleague's need for FMLA leave is foreseeable, he or she must give the company at least 30 days prior written notice by following the procedures set forth in this policy. Where the need for leave is not foreseeable, the colleague is expected to notify the company as soon as practicable, and generally must comply with the company's normal call-in procedures.

A colleague must initiate a request for leave of absence by going to [myHR.cvs.com](http://myHR.cvs.com) and selecting the myLeave link or by calling myHR at 1-888-694-7287, after which the company will send applicable forms and instructions to the colleague.

Colleagues must provide sufficient information for the company to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the colleague is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances surrounding the need for military family leave.

Colleagues also must inform the company if the requested leave is for a reason for which FMLA was previously taken or certified.

**Medical Certification:** If a colleague is requesting leave because of his or her own serious health condition, or the serious health condition of a covered relative



or serious illness or injury of a covered service member, the colleague and relevant health care provider must supply appropriate medical certification. After a colleague initiates a request for a leave of absence, the company will send the colleague notification of the requirement for medical certification, send appropriate forms, and instruct the colleague when they are due. Failure to provide requested medical certification may result in the delay and/or denial of the leave request. The company may contact the health care provider for purposes of clarification and authentication of the medical certification. If the leave is sought because of the colleague's own serious health condition, the company, at its expense, may require a second opinion examination/certification by a health care provider designated by the company, if it reasonably doubts the medical certification the colleague provided.

If the second health care provider's opinion conflicts with that of the first health care provider, the company, at its expense, may require that a third, mutually agreeable, health care provider conduct an examination and submit medical certification as a final and binding opinion. The company may require subsequent medical recertification as permitted by the FMLA. A certification form may also be required to support a colleague's request for leave for a "qualifying exigency," as described herein.

**The Company's Responsibilities:** The company must inform colleagues requesting leave whether they are eligible under the FMLA. If they are, the company's notice to the colleague must specify any additional information required as well as the colleague's rights and responsibilities. If they are not eligible, the company must provide a reason for the ineligibility.

The company must inform colleagues if leave will be designated as FMLA-protected and the amount of leave counted against the colleague's leave entitlement. If the company determines that the leave is not FMLA-protected, the company must notify the colleague.

**FMLA Leave is Unpaid:** FMLA leave is unpaid leave, however, a colleague may use any accrued paid time during an otherwise unpaid FMLA leave. For certain types of FMLA leaves, a colleague may be required to use any accrued paid leave time he or she has available.

In order to use paid leave for FMLA leave, the colleague must comply with the company's normal paid leave policies. This substitution of paid leave for unpaid FMLA leave time does not extend the total amount of FMLA leave time available to the colleague. The colleague's FMLA leave runs concurrently with other types of leave (such as paid vacation, state family leave laws, workers' compensation, paid disability, etc.), unless prohibited by applicable law.

**Intermittent or Reduced Schedule FMLA Leave:** A colleague does not need to use the FMLA leave entitlement in one block. FMLA leave can be taken intermittently (in separate blocks of time) or on a reduced leave schedule (reducing the usual amount of hours the colleague works per workweek or workday) when medically necessary. Prior to using intermittent or reduced schedule FMLA leave, a colleague is required to comply with the company's usual and customary notice and procedural requirements for requesting leave, absent unusual circumstances. Failure to follow the company's procedural requirements, FMLA protected leave may be delayed or denied.

Leave to care for the colleague's child after birth, or placement for adoption or foster care may not be taken on an intermittent or reduced schedule, except as

required by law. Colleagues must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the company's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis. In certain instances, a colleague on an intermittent or reduced schedule leave may be temporarily transferred to an alternative position that better accommodates the colleague's need for leave and that has equivalent pay and benefits.

**Reporting While on FMLA Leave/Requests for Extension of FMLA Leave:**

Colleagues on continuous FMLA leave must notify their immediate supervisor periodically to report on their expected date of return. If a colleague cannot return to work at the end of the approved leave, the colleague must request an extension to the leave by going to myHR.cvs.com and selecting the myLeave link or by calling myHR at 1-888-694-7287, providing reasonable notice to the company prior to the extension of the original leave. If a colleague fails to return to work at the expiration of a leave and an extension of the leave has not been approved by the company, the colleague may be subject to discharge.

**Benefits:** During an approved FMLA leave, the company will maintain the colleague's group health benefits on the same terms as if the colleague continued to be actively working. If paid leave is substituted for unpaid FMLA leave, the company will deduct the colleague's portion of the health plan premium as a regular payroll deduction. If the colleague's leave is unpaid, the colleague must continue to pay his or her colleague portion of the premium to the company in a timely manner in order to continue coverage. If the colleague's leave is extended beyond the FMLA leave period, the group health benefit coverage will be governed by the applicable plan documents.

Use of FMLA leave will not result in the loss of any employment benefit that accrued prior to the start of the colleague's leave.

**Return from Leave:** If a colleague takes leave because of his or her own serious health condition, the colleague will be required to provide a fitness for duty note before returning to work. The colleague may be asked to have his/her health care provider review the essential functions of the colleague's job and/or a job description, and specifically indicate whether the colleague can perform the essential functions of his/her job, with or without reasonable accommodations, before returning to work.

When the company requires such a detailed fitness for duty note, colleagues should use the company's fitness for duty form, which will be provided to them or may be obtained by calling myHR at 1-888-694-7287 and following the voice prompts to Leave of Absence. Colleagues returning to work from an approved FMLA leave will be returned to their original position, or to an equivalent position with equivalent pay, benefits and other employment terms, unless their employment would have been terminated in any event for reasons unrelated to the leave (such as position elimination).

**Unlawful Acts by Employers:** FMLA makes it unlawful for any employer to: interfere with, restrain, or deny the exercise of any right provided under FMLA; or discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

**Enforcement:** A colleague alleging a violation of the FMLA may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an



employer. Contact information for the U.S. Department of Labor is: 1-866-487-9243; TTY 1-877-889-5627; and [www.wagehour.dol.gov](http://www.wagehour.dol.gov).

FMLA does not affect any Federal or State law prohibiting discrimination, or supersede any State or local law or collective bargaining agreement which provides greater family or medical leave rights.

## **J. California State Family Care and Medical Leave (CFRA Leave) and Pregnancy Disability Leave (California colleagues only)**

Under the California Family Rights Act of 1993 (CFRA), if you have more than 12 months of service with us and have worked at least 1,250 hours in the 12-month period before the date you want to begin your leave, you may have a right to family care or medical leave (CFRA leave). This leave may be up to 12 workweeks in a 12-month period for the birth, adoption, or foster care placement of your child or for your own serious health condition or that of your child, parent or spouse. CFRA typically runs concurrently with FMLA leave.

While the law provides only unpaid leave, colleagues may choose or employers may require use of accrued paid leave while taking CFRA leave under certain circumstances.

Even if you are not eligible for CFRA leave, if you are disabled by pregnancy, childbirth or a related medical condition, you are entitled to take a pregnancy disability leave of up to four months, depending on your period(s) of actual disability. Pregnancy Disability Leave may run concurrently with FMLA leave. If you are CFRA-eligible, you have certain rights to take BOTH a pregnancy disability leave and a CFRA leave for reason of the birth of your child. Both leaves contain a guarantee of reinstatement — for pregnancy disability it is to the same position and for CFRA it is to the same or a comparable position — at the end of the leave, subject to any defense allowed under the law.

If possible, you must provide at least 30 days' advance notice for foreseeable events (such as the expected birth of a child or a planned medical treatment for yourself or of a family member). For events that are unforeseeable, we need you to notify us, at least verbally, as soon as you learn of the need for the leave. Failure to comply with these notice rules is grounds for, and may result in, deferral of the requested leave until you comply with this notice policy.

We may require certification from your health care provider before allowing you a leave for pregnancy disability or for your own serious health condition. We also may require certification from the health care provider of your child, parent or spouse, who has a serious health condition, before allowing you a leave to take care of that family member. When medically necessary, leave may be taken on an intermittent or reduced work schedule.

If you are taking a leave for the birth, adoption, or foster care placement of a child, the basic minimum duration of the leave is two weeks if taken on an intermittent basis, and you must conclude the leave within one year of the birth or placement for adoption or foster care.

Taking a family care or pregnancy disability leave may impact certain of your benefits and your seniority date. If you want more information regarding your

eligibility for a leave and/or the impact of the leave on your seniority and benefits, please contact myHR at 1-888-694-7287.

# III. What We Expect From You

CVS Health and your team members have basic expectations of you. In very general terms, you are expected to:

- Serve and satisfy your customers, including the CVS Health colleagues you support, while demonstrating our Heart At Work Behaviors;
- Work safely;
- Know your job and do it well, cooperate with others and support the goals of your team;
- Understand and follow the Code of Conduct and company policies; and
- Conduct your work and professional activities ethically, in accordance with all applicable laws and regulations.

## A. Our Standards of Conduct

On and off the job, we expect all CVS Health colleagues to comply with the law, and treat other people with respect, honesty and courtesy. Doing what is right is our basic standard of behavior. Your decisions and actions shape our reputation at CVS Health. That is why we must all commit to act with integrity while meeting our responsibilities. Illegal, unethical actions are unacceptable at CVS Health.

A handbook cannot cover every behavior or act that would be unacceptable, and it is no substitute for good judgment. The examples of unacceptable conduct in this chapter are just examples, not a complete list. If there is no written CVS Health policy specifically addressing a type of behavior or situation, you are always expected to act in a way that is consistent with the company's Code of Conduct, including its Purpose, Strategy and Heart at Work Behaviors which represent the guiding principles of CVS Health.

As you read through the following sections in this chapter, you need to understand that you could be disciplined or lose your job if you disregard or violate the company's standards of conduct as set out in the Code of Conduct, the company's policies, or in this handbook.

### **Examples of Unacceptable Conduct:**

Every day that we come to work at CVS Health or perform work on behalf of CVS Health wherever it is performed, we are all expected to comply with the company's standards of behavior. Some examples of conduct that could lead to discipline or termination include, but are not limited to:

- Illegal or unethical conduct, whether on or off the job
- Insubordination
- Dishonesty
- Theft or fraud, including falsification of records and theft of time
- Demeaning or abusive conduct toward others
- Use of profane language
- Sleeping on the job
- Conducting personal business during working (non-break) time
- Frequent unauthorized absences, tardiness, leaving work before the end of your shift, or other attendance related conduct that violates the CVS Enterprise Attendance Policy
- Interference with or failure to cooperate with an investigation
- Working "off the clock" or requiring a subordinate to work "off the clock" without pay for time worked
- Requesting or otherwise allowing a non-CVS Health colleague (such as a family member or friend) to conduct any CVS Health work or to enter work areas (such as the back room or office) that are restricted to CVS Health colleagues only
- Vandalism, or willful or careless destruction of or damage to the company's or another person's physical property
- Reckless conduct including the violation of safety rules
- Disabling safety guards or key lockouts on any equipment including conveyors, balers, forklifts or other power equipment
- Smoking in any company facility or work area
- Asking or allowing a minor colleague to perform duties that are unsafe or violate state or federal child labor laws

- Use, possession, distribution of or being under the influence of alcohol, illegal drugs or any other intoxicants while on CVS Health's property or performing work on behalf of CVS Health
- Unprofessional or inappropriate conduct around customers or others, which includes appearing to be intoxicated; calling into question colleague's professional judgment
- Threats, acts of violence, harassment, or intimidation toward another person
- Sexual harassment
- Possession of weapons of any kind in the workplace
- Selling any product in violation of state or federal law
- Engaging in illegal gambling, raffling, or other games of chance using company resources or in company facilities
- Unauthorized use of the company's physical property, equipment, or assets
- Making deliberately malicious statements regarding colleagues, customers, the company or products
- Failing to maintain a license, certificate, or registration required for the job, or failing to report an adverse action taken against a license or certificate
- Failing to protect and safeguard Protected Health Information (PHI), Personally Identifiable Information (PII), and the confidentiality of those we serve
- Disclosure or use of confidential or proprietary information in violation of CVS Health policy
- Giving or offering anything of value directly or indirectly to a public official in order to influence official action or obtain improper advantage
- Failure to disclose or report an actual or potential conflict of interest
- Failure to meet performance standards and expectations
- Failure to comply with all applicable laws, regulations and company policies

## **B. Coming to Work/Attendance**

All colleagues of CVS Health are important and contribute their unique talents to ensure that our customers, patients, clients and the members we serve receive quality service. Therefore, we consider regular and predictable attendance and punctuality to be an essential function of each colleague's job. To ensure continuity of our services, colleagues are expected to make a commitment to report to work on time for each scheduled shift. Excessive absenteeism, tardiness, and early departures seriously affect the cost and efficiency of operations, places an additional burden on colleagues who are in attendance, and ultimately affects our ability to provide excellent service to our customers, patients, clients and members. For this reason, absences, incidents of tardiness, or early departures should be addressed by the colleague's Supervisor or Manager, and depending on the circumstances, may result in corrective action or termination of employment.

The company recognizes that colleagues may become ill or have other emergencies or personal situations that prevent them from maintaining regular attendance. If an illness or emergency causes you to miss work or to be late or leave work early, you are required to contact your supervisor as soon as possible so plans can be made to cover your absence.

Depending on the circumstances, your failure to report to work and not notify your supervisor, and/or LOA Department or myHR, may result in disciplinary action, up to and including termination of employment, even for a first offense. If we do not hear from you, we may consider you to have voluntarily resigned from your job. Colleagues should refer to DOC-051628 CVSHealth Attendance Policy.

## **C. Accurately Recording Hours Worked**

CVS Health policy requires all non-exempt, hourly-paid colleagues to record accurately and completely all hours they work by carefully following and strictly complying with the time clock or other time reporting policies and procedures for their job and site. It is a violation of CVS Health policy to do work "off the clock" and non-exempt, hourly-paid colleagues are required to record all time worked. Colleagues who (1) use another colleague's ID, Badge or PIN number to access the other colleague's time records or to clock the other colleague in or out; (2) give their ID, Badge, or PIN number to another colleague to clock them in or out; (3) falsify time records (including both under-reporting and over-reporting time worked); or (4) improperly tamper with any time-keeping device, will be subject to discipline, up to and including termination.

## **D. Your Appearance**

The public perception of the company is dependent upon its ability to consistently demonstrate a dedication to cleanliness, professionalism and sound judgment. All colleagues are expected to dress and maintain personal hygiene in accordance with accepted professional business standards and the uniform guidelines that apply to the colleague's role and business unit.

When you dress for work, remember that you are part of the company image. As a provider of healthcare products, customers expect us to be clean and neat. In a customer's eyes, the way we look is as important as the way we organize the shelves. Our appearance can create a strong positive or negative impression about our business to customers, our communities, vendors and shareholders.

Depending on the location in which you work, you will be required to wear the clothing that has been designated by your facility as appropriate, such as business attire or safety clothing. The company has numerous dress standards for its wide variety of locations and job titles including general office workers, sales representatives, warehouse colleagues, delivery personnel, nurses, pharmacists and other personnel. It is important you understand the appropriate dress standards for your particular position. Your manager or supervisor can provide you additional information and guidance. Colleagues should refer to DOC-049243 Uniforms and Dress Code Policy.

While dress is a personal choice, certain attire is deemed outside the definition of "appropriate" dress. Such attire includes: shorts (walking or sport), skorts (i.e., shorts that look like a skirt), articles of clothing with vulgar, obscene, harassing, defamatory language or otherwise offensive language or graphics that would not be consistent with the Company's Colleague Handbook or Anti-Discrimination, Anti-Harassment and Anti-Retaliation policy, clothing or other apparel, including but not limited to face masks or other personal protective equipment, that includes commercial or political statements, logos or words of any kind; sun dresses, backless dresses or shirts, tank tops worn alone, sweat/workout outfits,

spandex tights, yoga pants, or form-fitting leggings, midriff shirts and tattered, torn, ripped or extensively worn slacks or denim jeans (except on casual days). Colleagues required to wear uniforms must not augment their uniforms with other types of clothing or decorative accessories, such as coats, scarves, headwear, fashion pins or buttons, patches, etc. Hats, sweaters, long sleeve shirts and jackets must be approved for wear and, in some settings, may be limited to Company logo wear. Security badges may be required depending on the employment location.

When necessary, Managers and Supervisors may respectfully and discreetly counsel colleagues whose dress and hygiene are not acceptable with the policy and practices for their respective line of business.. Colleagues sent home for violations of standards will not be compensated for the time spent correcting their attire unless otherwise required by applicable law. Repeated violations of this policy may lead to disciplinary action, up to and including termination of employment.

Colleagues who need to request an exception to any part of this policy as an accommodation due to religious beliefs or because of a disability should speak to their Manager or Human Resources and contact myHR by calling 1-888-694-7287 (888-MY-CVS-HR) .

If you have further questions about what is considered appropriate dress for work, ask your manager or supervisor.

## **E. Licenses and Certifications**

At all times during employment, colleagues who are hired into positions where applicable law or regulation requires licensure, registration, special training and/or certification must maintain current licensure and/or registration and meet all applicable requirements in the states in which the colleague practices.

A colleague who does not maintain the required registration, license, certification, education or credential will not be allowed to perform the duties of the position, and their employment may be terminated.

Colleagues will be personally responsible for fulfilling all necessary state requirements for maintaining active licensure/certification, including continuing education and clinical practice. Colleagues will also be responsible for becoming aware of, learning about and complying with any changes to state licensure/certification requirements.

If any negative action is taken against your license, registration or certification, such as sanctions, suspension, revocation, probation or expiration, you must immediately notify (1) your supervisor, (2) Human Resources, and (3) the Compliance Exception line 847-559-3099.

Additionally, if you are terminated, suspended, debarred or excluded from participation in federal healthcare programs such as Medicare or Medicaid, you must notify your supervisor and contact the Compliance Exception Line immediately.

If a colleague is working as a pharmacy technician in a state which allows a training period during which licensure is not required, the colleague is personally responsible for obtaining licensure within the training period allowed by the state.

Any colleague who carries out duties without the necessary licensure/certification will be disciplined up to and including immediate termination and may be subject to civil and criminal sanctions as well.

## **F. Employment of Minors**

CVS Health employs many people who are under the age of 18 years. CVS Health does not employ people under the age of 16 years. Federal law and state law have different rules for younger colleagues when it comes to duties, hours of work, certificates, and break/rest periods. If you hire or supervise any colleague under the age of 18, it is important that you familiarize yourself with these different requirements as they will vary from state to state. These requirements are set forth in CVS Health's Employment of Minors Policy DOC-012411.

In general, colleagues under 18 years of age may not:

- Load, unload, or operate scrap paper balers or paper box compactors;
- Climb on or operate a forklift;
- Enter in or operate a freight elevator;
- Load, unload, or operate a motorized conveyor belt;
- Adjust belts to machinery or cleaning, oiling or wiping machinery;
- Drive, or being a passenger in a motor vehicle on a public road as part of his or her employment;
- Serve as an outside helper on a motor vehicle on a public road;
- Sell alcohol; or
- Work with photo processing chemicals in concentrated form;
- Work during school hours when school is in session.

All colleagues, including the minors themselves, are responsible for enforcing and complying with CVS Health's policy and all applicable federal and state laws concerning the employment of minors. Adult colleagues who ask a minor to work a schedule that is not permitted or to do one of the tasks listed above may be disciplined, up to and including termination. In addition, managers who fail to ensure that minors have proper certificates may also be disciplined, up to and including termination of employment.

## **G. Colleague Theft or Fraud**

CVS Health takes incidents of colleague theft or fraud very seriously. Colleagues who engage in the following examples of theft or fraud may be terminated immediately:

- Theft of any kind, including theft of time
- "Sweethearting" or intentional under-ringing of purchases
- Providing your colleague discount card to someone else
- Discounting purchases without authorization
- Consuming or taking merchandise without paying for it first
- Manipulating register sales including unsubstantiated voids or refunds
- Misusing a coupon (e.g., using a coupon for a different product or for a size not discounted by the coupon)
- Misusing company loyalty programs such as ExtraCare
- Giving away product
- Ringing up your own purchases



- Making adjustments to individual purchases for any reason.
- Failing to keep a receipt for a purchase made while at work
- Holding merchandise to take advantage of a future markdown
- Providing confidential information to others that may be used by them to rob or otherwise harm the company, colleagues or customers (e.g., schedules of deliveries or bank deposits, security systems)

Colleagues may utilize self-checkouts to make purchases where available (store level colleagues are prohibited from using self checkouts).

## H. Your Reporting Obligation

In addition to reporting problems or issues to your supervisor, Advice & Counsel or the Ethics Line, you also have an obligation to report certain events that could impact CVS Health. For instance, you have an affirmative obligation to call the Compliance Exception Line at (847) 559-3099 to report if you have been placed on any state or federal exclusion lists, including the U.S. Department of Health and Human Services Office of Inspector General (OIG) and/or General Services Administration (GSA); if any of your employment-related professional licenses have expired, or been revoked and/or sanctioned; or if you have been convicted or pled guilty, no contest (*nolo contendere*), or entered into a pre-trial agreement, deferred adjudication or similar pardon program for a crime other than a minor traffic violation. Please note, the term “conviction” does not include:

- Arrests or charges that did not result in conviction;
- Convictions that have been judicially dismissed, expunged, erased or sealed; or
- Convictions that state law does not permit an employer to consider.

Notwithstanding the above, please note that any convictions involving controlled substances, **convictions involving Medicare, Medicaid or any state or federally funded program, and convictions that could result in exclusion from participation in any state or federal health care program must always be reported.**

## I. Keeping Your Records Up to Date

As a CVS Health colleague, you will have access to myHR, which is your one-stop, personalized online access to all the resources you need to manage your CVS Health rewards including health benefits, retirement planning, pay, colleague discounts and more.

Through myHR, you will have access to self-service tools that will allow you to update personal data, tax data, direct deposit, and personal profile elections on your own behalf. It is important for you to check myHR from time to time, and to keep all of your information updated, so that you continue to receive important information, and so that any necessary changes in your benefits apply as soon as possible. Please take the time to become familiar with myHR and all of the many tools and resources it offers.

## **IV. The CVS Health Workplace**

## A. Confidentiality

Your ability to keep and respect confidences is important in all aspects of CVS Health business and is particularly critical in CVS Health pharmacy matters. Our customers must be able to trust and have complete confidence that all CVS Health colleagues will protect and maintain as absolutely confidential the very personal customer/patient information that they may have access to, or otherwise become aware of, concerning our pharmacy customers. Every colleague shall, at all times, maintain and protect the confidentiality of customer/patient information. By way of example only, confidential customer/patient information includes information relating to prescriptions, diagnosis, medical treatment, therapy, family data and any other personal information regarding a customer (including credit standing/history). Except as is necessary for the proper completion of prescriptions and care of a customer/ patient, such information shall not be discussed or otherwise shared with other CVS Health colleagues or with any person outside of the CVS Health organization. Any third-party requests or inquiries for customer/patient information must be directed to the Privacy Office. Inquiries of a non-medical-related nature should be referred to your supervisor. In order to protect against the disclosure of confidential information, including but not limited to customer medical information, it is prohibited for any colleague to record a meeting or conversation regarding company matters during working time without the prior consent of all parties to the conversation.

In general, as a colleague of CVS Health, you may be exposed from time to time to confidential and proprietary information related to our customers, colleagues, technological innovations, business strategies and systems. By way of example, this includes trade secrets, customer lists, acquisition and divestiture information, customer/patient information, colleague information, information protected by state or federal law, including HIPAA protected information, computer systems data and information, financial data and information, terms and conditions of certain CVS agreements, and sales information. This includes information that might be of use to competitors or harmful to the company or those we serve if disclosed to others. It is vitally important that you understand that all confidential and proprietary information you may gain access to in the course of your job duties is the property of CVS Health and/or of the individual customer/patient or colleague.

In all cases you must:

- Use proprietary information only for job-related purposes, never for personal gain or to the detriment of CVS Health;
- Share proprietary information with co-workers only on a “need to know” basis, and not disclose it to persons outside the company, including business associates or those we serve, except under the terms of a confidentiality agreement approved by the Legal Department;
- Return all proprietary information in your possession upon leaving CVS Health;
- If you worked for a competitor before joining CVS Health, do not share proprietary and confidential business information of the former employer; and
- If you are asked to produce a CVS Health policy or procedure, ensure you are in compliance with our Distribution of CVS Health Policies and Procedures to PBM Clients and Other Third Parties Policy, available on the Policy and Procedure Portal.

Any concerns regarding this policy should be referred to the Privacy Office.

## **B. Privacy and Security of Customer Information**

Our role in the healthcare industry requires us to collect and maintain the personal health information of those we serve. This data, also called “Protected Health Information” or PHI, is protected under federal and state privacy and security laws. These laws require that PHI, such as names, addresses, dates of birth, phone numbers and social security numbers that are combined with medical information such as medical diagnoses, prescription histories and physician notations, be handled in a confidential manner.

“Personally Identifiable Information” (PII) must also be protected. PII is any piece of information which can potentially be used to uniquely identify, contact, or locate a single person. It includes the demographic information associated with PHI, as well as other unique identifiers such as credit card data, email addresses, driver’s licenses, finger prints, online contact information, religious affiliations, financial information, certain photographic images or handwriting.

It is critical that those we serve – including colleagues who also may be utilizing our retail or pharmacy services – are able to count on us to protect their personal and health information. Remember, the people we serve trust CVS Health to use their PHI and PII only for purposes of providing our services to them.

Protecting PHI, PII and the confidentiality of those we serve are conditions of employment with CVS Health.

You should:

- In all cases, use and disclose the minimum necessary PHI or PII to perform the job;
- Disclose PHI or PII to any third party only with appropriate written authorization from the individual, unless the law authorizes or requires the disclosure;
- Use health information with all identifiers removed whenever possible;
- Dispose of unneeded copies of documents containing PHI or PII in the available shred bins and bags;
- In your work space, never leave PHI or PII lying on desks, active on computers, in fax machines or in any other generally accessible area;
- Take special care to secure PHI or PII when transmitting or transporting it outside CVS Health; and
- Make sure to encrypt any PHI or PII on portable devices (such as cartridges, USB devices, disks, laptops, mobile devices) or transmitted through the Internet.

It is the responsibility of each colleague in possession of confidential information to use all appropriate and reasonable safeguards when handling and disposing of confidential information in their possession or control.

Adherence to this Confidentiality Policy is a condition of hire and continued employment at CVS Health. If you violate this policy, disciplinary action up to and including termination of your employment — even for a first violation — will be taken.

In addition the unauthorized disclosure of customer/patient information may also expose CVS Health and/or you personally to legal claims by customers or their

family members for improper disclosure of private information. Finally, anyone who releases, uses or discloses confidential health care information without proper authorization may also be subject to civil and/or criminal penalties under applicable state and federal laws.

## **C. Use of Company Property**

CVS Health provides you with the tools and materials you need to do your job.

The company's physical assets include items such as inventory, office and store equipment, vehicles, supplies, reports and records, computers, e-mail, telephones, cell phones and other mobile devices, voicemails, internet, and any other tangible property that CVS Health owns, rents or leases. Company assets may also be non-physical, for example, the company name, logo, trade secrets, strategies and customer information. Protecting CVS Health assets against loss, theft or other misuse is the responsibility of every colleague because it directly impacts our reputation and profitability.

All company assets are the sole property of CVS Health. The company reserves the right to monitor, access and search company assets, including computers, e-mails, phones, voicemails, and internet usage and history at any time, without providing advance notice to colleagues. Colleagues are prohibited from sharing user access credentials (i.e., ID's and passwords) with anyone.

When circumstances warrant, CVS Health may require any colleague, while on duty or on CVS Health property, to submit to a non-invasive inspection of their person, vehicle, uniform, locker, package, handbag, briefcase or other personal property.

## **D. Solicitation and Distribution**

To maintain a proper business environment and to prevent interference with work and inconvenience to others, colleagues may not solicit for any purpose nor distribute literature or other materials in any format or medium (ex., paper, electronic, etc.) within CVS Health's buildings or on CVS Health's property during the colleague's working time or the working time of any colleague being solicited or approached. "Working time" is defined as those times of the workday when colleagues are supposed to be engaged in work. "Working time" does not include a colleague's authorized lunch or rest periods or other time when the colleague is not required to be working, including before and after working time.

Distribution of printed or electronic materials, including brochures, flyers, e-mail or written literature of any kind, is prohibited at all times in any work area. Non-colleagues may not solicit, canvas, or distribute literature or other materials within CVS Health's buildings or on CVS Health's property at any time.

## **E. Media Relations**

CVS Health is one of the largest providers of prescription medications in the United States. It is the subject of regular media interest nationally and locally in the states where our stores and facilities operate. Generally, the company will respond to media outreach through designated spokespersons. Requests to the company for information or interviews from the news media are to be referred to the Corporate Communications Department. News media includes newspapers, television, radio, trade journals, websites, market research firms and the like.

Under no circumstances may a colleague claim to speak on behalf of CVS Health to a member of the news media without the approval of the Corporate Communications Department. If you are contacted by the news media about any issue pertaining to CVS, we suggest you state: "I am not authorized to comment on behalf of the company, You will need to contact our Corporate Communications Department." You should also notify your supervisor about the media inquiry as soon as possible.

Additionally, news media personnel or commercial film crews/photographers are not permitted to film or take photographs in any company location (CVS Health store, mail order facility, pharmacy, specialty pharmacy or other CVS Health facility) without prior approval of the Corporate Communications Department. Any camera crew, film crew or photographer attempting to film or photograph company locations must be refused and instructed to leave the premises until they obtain authorization from the Corporate Communications Department.

Our leaders also attract vendors, investment professionals, other organizations and individuals who want to be publicly associated with our brands. This is done through business relationships, participation in industry events where our colleagues are asked to participate in presentations, roundtable discussions, webinars and other public events. In order to enhance our corporate reputation and brands, ensure the messaging of CVS Health is not misinterpreted and protect the company's confidential and proprietary information, we need to ensure that all media presented as endorsed by CVS Health is reviewed and approved before it is delivered/presented. The Corporate Communications Department is responsible for these reviews. Please ensure all requests for this type of information are approved through the Corporate Communications Department prior to delivery/presentation. Certain types of information sharing outlined may also require the approval of the Investor Relations Department or the Legal Department as well. CVS Health colleagues are not authorized to speak on behalf of the company without approval from the Corporate Communications Department.

For more on this topic, please refer to CVS Health Media Policy.

## **F. Internet and E-Mail**

Internet and e-mail services and software are provided by CVS Health to assist in the conduct of company business and should be used primarily for business purposes only. Colleagues using the company internet connection and e-mail services are considered to be representatives of CVS Health and/or its subsidiaries and should act in accordance with the following established general company guidelines:

- Using the systems to solicit outside business ventures for personal financial gain, or religious or political causes is strictly prohibited.
- Downloading or uploading of data from or to the Internet is only permitted for official company use.
- It is strictly prohibited to create, transmit, download or upload any violent, discriminatory, abusive, demeaning, threatening, harassing, intimidating, or coercive messages or files, or visit any Web or Internet sites containing pornography, hate-speech, gambling or unlawful conduct.
- No one is permitted to maintain a personal public Web site that represents itself as a CVS Health Web site.

### **1. Internet Guidelines**

All of the company's technology resources are the sole and exclusive property of CVS Health and, as relevant, its vendors and licensors.

By accessing and using CVS Health technology resources or any CVS Health Information Assets, all colleagues expressly understand and agree that:

- All access, use or disclosure are for authorized use only and will comply with the CVS Health Code of Conduct and applicable policies, including without limitation, the policies and standards of the Privacy and Information Security Programs;
- As associated with any access and use, CVS Health may (a) collect personal data (b) routinely monitor, intercept, and search any data and (c) use or disclose any data (including transfer to the U.S.); and
- Any improper or unauthorized access and use may be subject to criminal/civil penalties and disciplinary action, including termination.

Colleagues may not use the technology resources for personal financial gain or the financial benefit of any third party (including the sale of any non-CVS Health products or Services), or in violation of CVS Health policies and applicable laws relating to solicitation, political activity or lobbying. The technology resources may also not be used to create, store, or distribute any form of Malicious Software (e.g., viruses, worms, or other destructive code).

### **2. Misuse of Software**

Without approval from authorized CVS Health Management, colleagues may not do any of the following:

- Copy CVS Health owned or licensed software for use on their home computers;
- Provide copies of CVS Health owned or licensed software to any independent contractors or consultants of CVS Health or to any third party;
- Install software (including screen savers and games) or any updates to any existing software on any of CVS Health's Workstations or Servers;

- Download any software from the Internet or other online Service to any of CVS Health's Workstations or Servers;
- Modify, revise, transform, recast, or adapt any software; or
- Reverse engineer, disassemble, or decompile any software.

Colleagues who become aware of any misuse of software or violation of copyright law must immediately report the incident to their supervisor or other responsible manager.

Unauthorized possession or removal of the following from CVS Health property is prohibited:

- Any proprietary, trade secret protected, or confidential business data, electronic or hardcopy; or
- Any computer equipment and/or software.

In order to safeguard its assets, individual company offices are responsible for implementing security guidelines and procedures including an auditable removal of property controls.

Finally, without prior approval by Information Security, Agents may not accept or agree to be bound by any terms and conditions of use (other than standard terms and conditions of use for access to web sites), license agreements, or other types of online agreements that are in excess of the Agent's authority for written agreements.

### **3. E-mail Guidelines**

Data that is composed, transmitted, accessed, or received via company email or the company internet system shall not contain content that shall be considered discriminatory, obscene, threatening or harassing to any person.

Examples of unacceptable content may include, but are not limited to, sexual comments or images, racial slurs, gender-specific comments, or any other comments or images that shall reasonably offend someone on the basis of race, age, sex, religious beliefs, national origin, disability, sexual orientation, gender identity or expression, veteran or military status, or any other characteristic protected by law or in violation of CVS Health policies.

All messages composed, sent, or received on CVS Health e-mail systems and all files downloaded from the Internet are and remain the property of CVS Health and may be considered to be part of the official records of CVS Health and, as such, are subject to disclosure to law enforcement or other Third Parties.

CVS Health reserves the right and intends to exercise, the right to review, audit, intercept, access and/or disclose any messages, files and Internet site visits which for any purpose were created, sent, or received over email and/or internet systems, without the permission of the colleague.

Access to personal webmail through the company network and guest wireless network is strictly prohibited. This restriction applies to all company-issued laptops and desktops that have the ability to access personal webmail through the CVS Health network.

Colleagues shall not transmit personal comments, statements, or opinions via CVS Health email that may be mistaken as the position of CVS Health.

Colleagues shall not send or participate in chain letters, pyramid schemes, or other illegal schemes.



Using the systems to solicit outside business ventures, political, or religious causes is strictly prohibited. To maintain a proper business environment, and to prevent interference with work and inconvenience to others, solicitation, or distribution of material (including Email) from one colleague to another is prohibited while either is on working time.

Confidential Information and sensitive information shall not be included in email or internet communications unless proper, formalized security precautions have been exercised; certain email communications may contain privileged or confidential Information.

CVS Health e-mail systems shall not be used for the unauthorized external transmission of confidential or proprietary information, PHI or PII, copyrighted or similar materials. When authorized, such e-mails should be encrypted before being sent.

Violations of this policy should be reported to an appropriate manager or to the Advice & Counsel Department for investigation and resolution.

For more on this topic, please refer to CVS Health Information Security Acceptable Use Standard Policy.

## **G. Personal Use of Cell Phones and Other Electronic Devices**

CVS Health is committed to having a professional work environment where colleagues are able to perform their work without unnecessary distraction.

While at work, Colleagues are expected to limit personal use of all electronic devices. Personal calls, text messages, social media and other technological activities during working time, whether done on equipment owned by the colleague or the company, interfere with the productivity of the colleague and others and therefore, is generally prohibited. Such activities should be limited to non-work time such as breaks. Certain positions and/or departments may allow personal electronic devices for authorized work-related use of certain applications during work hours, i.e. myChat.

Due to the nature of our business and the highly sensitive information kept in our workplace, we must take steps to avoid the breach of confidentiality and the loss of company trade secrets, PHI or PII or other personal information. The use of electronic devices to photograph, copy, or record information or images at work may cause a breach of confidentiality of CVS Health's trade secrets or Confidential Information and is generally prohibited unless work-related. Colleagues should not use cell phones or other devices to take or post pictures or record audio or video at work if: (1) doing so would violate the law; (2) the colleague does not have the consent of all parties involved; or (3) the colleague is in an area, such as a restroom, locker room, behind the pharmacy counter, in the manager's office, or near a computer or monitor where sensitive information is present.

## H. Social Media

As the online landscape continues to evolve, the opportunities for CVS Health colleagues to communicate with one another, customers, partners and the world at large are also growing. While social media is a new way to communicate, it doesn't change the values that CVS Health promotes as a company, and that we ask each of you to exemplify in your daily work as a CVS Health Colleague. We encourage you to be a champion on behalf of the Company, while keeping the CVS Health Behaviors in mind.

Consistent with the Company's approach to interacting with the traditional news media, only designated CVS Health colleagues are authorized to speak on behalf of the Company in social media. Colleagues who choose to speak on social media about the Company in any way must make it clear that although they are a CVS Health colleague, they are not speaking on behalf of the Company or as an official Company representative.

In this context, "speaking on behalf of the company" means giving the impression, through your words, title or otherwise, that your statement is the company's official account of an event or position on a topic. Please see the CVS Health Social Media Policy for guidelines on distinguishing between personal social media and work social media.

All CVS-branded social media accounts (using "CVS," "CVS Health" or any CVS business unit, department or product name as part of the account name or URL and/or using the CVS logo or portion of the logo in any way) must be approved in advance. It is against Company policy for any colleague to create a CVS social media account outside of the outlined protocol in the CVS Health New Social Media Channel Request Policy.

- CVS Health colleagues who choose to make use of social media or otherwise engage in online communications as an identifiable colleague of CVS Health must comply with the CVS Health Social Media Policy and Colleague Social Media Guidelines at all times and on all forms of social media.
- **Use good judgment.** You are responsible for your actions online. CVS Health colleagues are expected to be honest and to exercise common sense and good judgment in social media postings and other online communications.
- **When you're at work, work comes first.** Use of social media for personal purposes while on working time is generally inappropriate, particularly if it will interfere with safety, service, or productivity. Occasional use of CVS Health technology that is not related to work activities is allowed, but online activities must not interfere with job duties or customer commitments.
- **Distinguish personal social media and work social media.** CVS Health colleagues are not authorized to comment for CVS Health. Personal opinions should be stated as such. CVS Health colleagues who choose to mention or discuss their work, CVS Health, colleagues, or CVS Health products or services in personal social media interactions must identify themselves as current CVS Health employees.

The disclaimers outlined in the CVS Health Social Media Policy must be used on your personal social media accounts if you are speaking about CVS Health in any way, including re-sharing information from official CVS Health social media accounts.

- **Always be clear about who you are and where you work.** If you are introducing a topic or joining a conversation about CVS Health, make your connection to the Company and to the issue clear up front.
- **Protect personal and confidential information.** Our Code of Conduct makes clear the importance of protecting the privacy and security of PHI, PII, and colleague information. While nothing in this section prohibits employees from discussing the terms and conditions of their employment, confidential information concerning CVS Health customers and patients, or confidential personnel information concerning other colleagues gained from unauthorized access to or use of confidential records shall not be disclosed, directly or indirectly, or used in any way through social media or other online communications.
- Do not post photos taken behind the pharmacy counter in any pharmacy or show computer screens in any setting that might contain PHI, PII, or confidential, proprietary information. You also should not share photos containing internal-only slides or presentations in any social media channels.
- **Do not be disrespectful or break the law:** You should not post anything discriminatory, harassing, bullying, threatening, defamatory, or unlawful. Don't post content, images or photos that you don't have the right to use.

**Know the rules. Federal, state and local regulations – and social media site terms of service – limit our ability to discuss some topics and can require us to disclose certain information.**

## **I. Prevention and Detection of Fraud, Waste and Abuse**

### **Deficit Reduction Act of 2005 (DRA) § 6032 – Education About False Claims Recovery**

CVS Health is committed to operating its business with high ethical standards and in compliance with applicable law. This commitment includes complying with all laws that prohibit fraud, waste, and abuse in the government health programs, such as Medicare and Medicaid.

CVS Health has established a Compliance Program and written policies to educate colleagues (and certain contractors and agents) about such laws, certain colleague rights and company policies and procedures for preventing, detecting and resolving fraud, waste, and abuse. For more information, refer to the CVS Health DRA § 6032 – Education About False Claims Recovery Policy available on the Policy and Procedure Portal.

The DRA § 6032 – Education About False Claims Recovery Policy provides a detailed discussion of the section 6032 Deficit Reduction Act of 2005, the Federal False Claims Act, and similar state laws that make it illegal to use false statements or documents in billing government health care programs such as Medicare and Medicaid. The Federal False Claims Act is a law that forbids the sending of a false claim or bill to the federal government for payment from a federal program, including Medicare and Medicaid. Either the government or a

private citizen (in the name of the government) may bring a suit to enforce the False Claims Act. This law also prohibits an employer from punishing a colleague for lawfully bringing a suit under the False Claims Act or helping the government enforce this law. Many states also have laws like the Federal False Claims Act. These state laws generally make it illegal to send a false claim or bill to the state government for payment from a state program, such as Medicaid. Some parts of these state laws may be different from the federal False Claims Act. As part of its Compliance Program, CVS Health has developed the CVS Health Code of Conduct and related policies and procedures for detecting and preventing fraud, waste and abuse.

CVS Health encourages you to report any ethical misconduct or compliance concerns such as false claims or false statements to your manager, the Compliance Officer, or by using the toll free Ethics Line (1-877-CVS-2040).

## **J. Corporate Environmental Policy**

CVS Health is committed to operating in a manner that meets or exceeds environmental laws and regulations. We expect all of our colleagues to understand and comply with CVS Health's Environmental Compliance Policy, available on the policy and procedure portal, as it applies to their job functions. Our Leadership is committed to providing the resources to implement this Environmental Compliance Policy. We believe innovative thinking and collaboration will lead to stronger environmental performance and will lessen our impact on the communities where we live and do business.

CVS Health expects its vendors and other third party providers to share this same commitment to environmental compliance and the environment.

CVS Health has created environmental compliance programs under the framework of a Corporate Environmental Management Program (EMP) to responsibly manage environmental aspects of our business. These programs address a number of environmental topics such as hazardous and solid waste management, fuel storage tanks, air emissions from fuel powered equipment, wastewater, storm water, refrigerant management and site remediation. Program elements are integrated into the CVS Health policies and procedures to ensure proper controls and management standards for compliance with environmental regulations.

## **K. Gifts and Entertainment**

Giving and receiving business meals, gifts, and entertainment is a customary way to strengthen business relationships and is generally an accepted practice at CVS Health. That said, specific rules apply depending on whether you are giving or receiving the courtesy. For example:

- Meals and entertainment must be modest by local standards;
- The venue must be conducive to business discussions and the event must include legitimate business discussions;
- The person or entity hosting the event must attend with you;

- You may only accept gifts of nominal value such as branded mugs, hats, or similar items;
- You may never give or accept cash or cash equivalents (e.g. gift cards).

Additional rules apply depending on the situation and whether you are giving or receiving the courtesy. You should review the Meals, Gifts, and Entertainment Policies *before* you give or accept meals, gifts or entertainment.

## J. Conflicts of Interest

A “conflict of interest” may arise when personal interests or activities appear to improperly influence our ability to act in the best interests of the Company. Colleagues must make prompt and full disclosure of any situation that may involve an actual or potential conflict of interest. Colleagues should contact the CVS Health Conflict of Interest Line at (847) 559-4100 to make such disclosures, or to report any questions, problems or issues regarding conflicts of interest. Certain colleagues may also be required to sign an annual Conflicts of Interest Certification as outlined in the CVS Health Conflicts of Interest Policy available on the Policy and Procedure Portal.

Situations involving a conflict of interest may not always be obvious or easy to resolve. Some circumstances that may present an actual or potential conflict of interest include, but are not limited to:

- Outside employment;
- Participation in certain outside organizations;
- You or a close relative having a financial interest in a CVS Health competitor, vendor or client;
- Use of Company assets for certain purposes;
- Employment of relatives; and
- Intimate or romantic relationships.

For further details as to what may qualify as a potential conflict of interest, please consult the CVS Health Conflicts of Interest Policy. If any transaction or relationship could lead to a conflict of interest for a corporate officer or a member of the Board of Directors, disclose it to the Chief Compliance Officer, who will notify the Board of Directors. Conflicts of interests involving the Chief Compliance Officer also must be disclosed to the Board of Directors.

## V. Pay and Benefits

CVS Health rewards good performance. Our wages and salaries are competitive with those of other leading companies. Your compensation is directly related to your credentials and experience, your job responsibility and performance, the performance of the company, the geographic area in which you work, and other market factors.

Pay increases may be determined on the basis of performance, adherence to company policies and procedures and ability to meet or exceed job-related duties and achieve performance goals, demonstration of Heart at Work behaviors, as well as other business considerations.

CVS Health offers a wide range of benefit plans and programs. You automatically receive some of these benefits; others are optional. We recognize that people's lifestyles and benefit needs change. We continually explore ways to modify existing plans or to offer new plans that will provide more value for the changing needs of our team members. Accordingly, both the type of benefits CVS Health provides and the extent of coverage may change at the company's discretion.

As a CVS Health colleague, your compensation consists of more than just your regular pay for time worked. Your total compensation also includes a comprehensive benefits package, which is the complete range of benefit plans for which you are eligible. The financial value of this package is significant. The amount of your pay plus the value of your benefits equals your total compensation — the true financial reward you receive from CVS Health in exchange for your work.

## A. Non-Exempt Colleagues

Under the Fair Labor Standards Act (“FLSA”), non-exempt colleagues must be paid at least the federal minimum wage (or state minimum wage, whichever is higher) and must receive overtime pay for all time worked over 40 hours in a workweek. Non-exempt colleagues also may be entitled to other types of overtime under applicable state laws. Colleagues who are entitled to overtime are referred to as “non-exempt.”

As a non-exempt colleague, you are required to accurately report all the time you work each day in CVS Health’s timekeeping system (e.g., by clocking in with a card swipe, at a cash register, or by using other timekeeping devices that exist in the facility you work in). You must accurately record all regular and overtime hours worked, any absences, arrival and departure times, and meal breaks. All required training also must be recorded in the timekeeping system. You should review your recorded hours to ensure that the timekeeping system has captured all of the hours you worked. If your time records are not accurate, you should notify your supervisor or Advice & Counsel immediately.

Non-exempt colleagues are prohibited from working “off-the-clock” at any time (i.e., working without reporting the time worked to CVS Health). Non-exempt colleagues should not work any hours that are not authorized by their supervisors. This means, for example, that non-exempt colleagues must not perform any work before clocking in at the start of their shift, perform any mandatory work related training while off the clock, perform any work during their meal breaks, or perform any work after clocking out at the end of their shift, or perform any other extra or overtime work unless directed to do so by a manager. If you have any questions about when or how many hours you are expected to work, you should contact your supervisor. However, even unauthorized work must be accurately recorded in the company’s timekeeping system.

Managers of non-exempt colleagues are responsible for ensuring that non-exempt colleagues are properly compensated for all hours worked, including for the time it takes to complete any mandatory training.

It is a violation of CVS Health policy for any colleague to work “off-the-clock”, incorrectly report hours worked, or alter another colleague’s time records. It is also a violation of CVS Health policy for anyone to instruct or encourage another colleague to work “off-the-clock”, incorrectly report hours worked, or to alter another colleague’s time records. If anyone instructs or encourages you to work “off-the-clock”, incorrectly report your hours worked, or alter another colleague’s time records, you should not do so and should report the incident immediately to your supervisor, Advice & Counsel at 888-694-7287 (888-MY-HR-CVS).

## B. Exempt Colleagues

Under the FLSA and applicable state laws, some colleagues are considered exempt from the minimum wage and overtime pay requirements.

If you are classified as an exempt colleague, you will receive a predetermined weekly, biweekly or monthly base salary. Depending on your position, you may also be eligible for additional compensation. Your base salary as an exempt colleague will be established at the time you are first hired into an exempt position. Your base salary is subject to review and may change from time to time.



However, it will not be reduced due to variations in the quantity or quality of work you perform.

Under applicable law, salary is subject to certain deductions. For example, absent contrary state law requirements, the company can reduce your salary for the following reasons:

- Full day absences for personal reasons, sickness or disability
- Unpaid disciplinary suspensions of one or more full days imposed in good faith for violations of a written workplace conduct policy applicable to all colleagues
- Leaves of absence taken pursuant to the Family and Medical Leave Act
- Time not worked during the initial and final weeks of employment
- You did not perform any work in the workweek

In any workweek in which you perform work, your salary will not be reduced for any of the following reasons:

- Partial-day absences for personal reasons, sickness or disability
- Absences on a regularly scheduled work day when CVS Health decides not to operate the store or other facility where you work
- Absences for jury duty, attendance as a witness, or military leave
- Unpaid disciplinary suspensions of less than one day, or unpaid suspensions for reasons that do not involve violations of a written workplace conduct policy applicable to all colleagues

## **C. Timekeeping and Payroll Practices**

It is the policy of CVS Health to pay its colleagues all compensation they are entitled to receive in compliance with all applicable state and federal laws. This policy describes some of the basic rules concerning CVS Health's timekeeping and payroll procedures, as well as the steps colleagues should follow to ensure that they are paid properly for all time worked.

## **D. Meals and Rest Breaks**

The company provides meal breaks and rest periods for colleagues who work shifts that exceed a certain number of hours per day. There are certain state requirements that must be followed when their requirements provide for additional or longer meal breaks and rest periods than those provided by CVS Health's policy.

Although you may wish to work through your meal or rest period to assist customers, your managers or colleagues, or to leave work early, it may not be allowed under state law. Even in the few states that allow you to work through your meal or rest periods, you may not do so without signing a meal break waiver. If you do work through an unpaid meal period or your unpaid meal period is interrupted, you should notify your manager to ensure that your working time is correctly included in your pay. If you notice that a meal period that you did not take was deducted from your pay, you should promptly notify your manager and request a correction.

For more on this topic, please refer to CVS Health's Meal and Rest Periods Policy and any other separate Meal and Rest Periods policy that is specific to your job position and location.



## **E. Review Your Pay Stub**

CVS Health works hard to ensure that all colleagues are paid correctly, but mistakes can happen occasionally. When mistakes do occur and are called to the company's attention, CVS Health will promptly make any corrections necessary. Please review each paycheck and pay stub when you receive them to make sure your hours are recorded correctly and your pay and any deductions taken are correct. If you believe an error has occurred, or if you have any questions about your paycheck or pay stub, please promptly report the matter to your supervisor, Advice & Counsel, or call myHR at 1-888-MY-HR-CVS.

## **F. Reporting Errors and Omissions**

If you have questions about deductions from your pay, if you believe you have been subject to any improper deductions, or if your pay does not accurately reflect your hours worked, please immediately contact your supervisor, Advice & Counsel or myHR at 1-888-MY-HR-CVS. If you have not received a satisfactory response within five business days after reporting an incident, please immediately contact the toll-free CVS Health Ethics Line at 1-877-CVS-2040.

Every report will be fully investigated and CVS Health will make every effort to ensure that you receive the pay to which you are entitled. CVS Health will not allow any form of retaliation against individuals who make good faith reports of alleged violations of this policy, or who cooperate in CVS Health's investigation of such reports, even if the reports do not reveal any errors or wrongdoing. Retaliation is unacceptable, and any form of retaliation in violation of this policy will result in disciplinary action, up to and including discharge. If CVS Health concludes that a colleague has violated this policy, corrective action will be taken, where appropriate, up to and including discharge.

## **G. Pay Transparency**

CVS Health will not discharge or in any other manner discriminate against colleagues or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another colleague or applicant. However, colleagues who have access to the compensation information of other colleagues or applicants as a part of their essential job functions cannot disclose the pay of other colleagues or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information. 41 CFR 60-I.35 (C)

## H. Pay Period/Payday

CVS Health has a number of different pay cycles/schedules:

- The workweek for all colleagues begins on Sunday and ends on Saturday.
- The bi-weekly pay period begins on Sunday and ends on the second Saturday. Direct deposits are posted to your account for availability the Friday following the pay period. Receipt of paychecks is targeted for the Friday following the pay period.
- The semi-monthly pay period begins on the first day of the month through the 15<sup>th</sup> and again the 16<sup>th</sup> through the last day of the month. Direct deposits and receipt of semi-monthly paychecks are targeted for the 15<sup>th</sup> and last business day of the month. If either of these days falls on a weekend, payment occurs the Friday before.

You will receive a statement of earnings (i.e., a pay stub) for each pay period. This may be delivered to you in paper format attached to your paycheck or viewable only on myHR.cvs.com, depending on where you work and what elections you have made. This statement shows details regarding your pay, such as your regular and overtime earnings for the pay period and for the year, and your itemized current and year-to-date deductions. You may view your statements of earnings for the past year at any time by visiting myHR.cvs.com. You may obtain older statements of earnings by calling myHR at 1-888-MY-HR-CVS.

## I. Direct Deposit

CVS Health can electronically deposit your paycheck into a financial institution associated with the National Automated Clearing House Association (NACHA). To ensure availability of funds on the scheduled pay date, CVS Health urges all colleagues to enroll in either the Direct Deposit Program or to sign up for the Money Network Service (MNS) electronic distribution of funds program. The funds will be placed on a card and can be accessed at either an ATM or through a MNS convenience check.

## J. Colleague Recognition

Heart At Work® Recognition, the CVS Health colleague recognition program, provides a way for you to recognize colleagues who demonstrate an unwavering commitment to delivering on our Purpose of bringing our hearts to every moment of your health. It also provides a way to recognize colleagues for going above and beyond in bringing their heart to every moment of health.

**Thanks to you!** – Provides all colleagues a way to share a simple thank you, using a recognition post that is viewable on the Heart At Work® Recognition newsfeed.

**Thanks to you! (with points)** – Allows colleagues to award recognition points who have gone above and beyond in the demonstration of our company Heart At Work Behaviors™.

**Boost** – Highlight a recognition by boosting it with extra points.

## VI. Your Safety

## A. Commitment to Safety

CVS Health is committed to providing a safe and healthy environment. Unsafe practices can lead to serious consequences, such as personal injury, injury to colleagues or customers or other serious outcomes. We are committed to the well-being and safety of ourselves, our colleagues and anyone doing business with us. We believe in full compliance with the safety and health standards contained in the Occupational Safety and Health Act (OSHA) and all state and local health and safety regulations.

Maintaining a safe workplace is everyone's responsibility and involves the following:

- Follow all safety rules, procedures and signage.
- Always engage in safe work practices.
- Ask questions when you are uncertain about how to perform a job, or whenever concerns exist about workplace safety and health.
- Report all injuries and accidents to management immediately and call 1-888-myhrcvs .
- Participate in safety program activities including trainings, meetings and Huddle Talks and use of colleague best practices.
- Notify management of all observed hazards, unsafe conditions and health concerns.
- Promote safety awareness among co-workers to prevent injuries to colleagues and customers.

To prevent workplace injuries, you must follow all applicable safety rules and procedures at all times, be alert and exercise common sense whenever you are at work.

If you believe a safety issue is not being addressed in a timely manner, or if you are uncomfortable reporting a safety-related concern to your manager or supervisor, you may call the Safety Hotline at 1-888-464-2960

## B. Safety Rules and Procedures

Specific safety rules and procedures apply at each CVS Health work location. These rules and procedures include, but are not limited to:

- Colleagues under the age of 18 years or colleagues who have not been trained are not allowed to load, unload or operate any powered equipment or machinery, such as compactors, balers, forklifts, elevators, electric pallet jacks, and conveyor belts.
- Wear proper clothing for your job and the task you are performing. Loose-fitting clothes, neck ties, dangling jewelry, and loose hair can cause accidents, particularly when using powered equipment such as conveyor belts or compactor/balers. Shoes should be slip-resistant.
- Utilize proper lifting techniques and body mechanics for all lifting, and use mechanical lifting equipment if certified and authorized.
- Use cutting devices properly and with care. Always cutting away from yourself. Do not leave them on the sales floor.
- Do not stand on any object other than a step stool, ladder or other equipment designed for that purpose.
- Report electrical trouble immediately. A small shock, sparking, overheating or electrical smells are urgent warnings.

- Do not lay or string electrical cords across aisles, under carpet tiles, stairs, open doorways, walkways, or through ceiling tiles, etc. Electrical cords must be kept in good condition. If a cord is frayed or a plug is loose, do not use the cord.
- Report any gas smell to your manager immediately. Do not flip electrical switches if you smell gas.
- Any obstructions to hearing (i.e.: iPhones, bluetooth speakers or radios, etc.) are not permitted during working hours unless authorized by your supervisor.
- Learn the location of exits, evacuation maps, fire extinguishers, first aid kits and eyewash stations if applicable.
- Properly use any personal protective equipment required.
- Inspect equipment before use. Report any unsafe equipment to your manager or supervisor or to the Safety hotline immediately. Do not use any unsafe equipment until it has been repaired or replaced. Any equipment that is in need of repair should be locked out or tagged out by a manager or supervisor.
- Report any aggressive or violent colleague or customer behavior to your manager or supervisor, or to the Confidential Ethics Hotline immediately. If you are concerned about imminent danger, call the police.
- Use only the machines, tools and equipment you are authorized and trained to use and follow all safety rules.
- Read and obey all warning signs or labels.
- Don't engage in horseplay, running or throwing objects.
- Keep aisles and walkways clear for customers. All aisles must have 36 inches of width for customers with disabilities or strollers. Stack boxes or totes neatly at the end of an aisle, and keep stock carts from blocking aisles.
- Keep hallways and stock areas clear.
- Keep emergency exits and all doorway areas clear.

To learn details about specific safety rules and procedures applicable to your work location, see your manager, supervisor, Human Resources or Advice & Counsel.

## C. Violence in the Workplace

The company will not condone any acts or threats of violence committed by or against its colleagues, customers, visitors, or vendors either on the company's premises at any time or while engaged in company business. Conduct that is prohibited under this policy includes, but is not limited to, the following actions:

- Any act which is physically assaultive (e.g., attacking, hitting or shoving an individual), including any inappropriate touching;
- A threat or gesture indicating an intent to harm another or endanger the safety of colleagues or destroy property, that is made in person, by phone, mail, e-mail, or other electronic means, including social media;
- Possessing firearms, weapons, or other objects that pose a potential for violence or threat within CVS Health's buildings or on CVS Health's property (with the exception of firearms properly stored in vehicles pursuant to CVS Health Policy and where applicable under state law); and

- Conduct which constitutes bullying, harassing or intimidating behavior, whether in person or by phone, mail, text, e-mail, or other electronic means such as social media.

Colleagues must report any signs of workplace violence either to their immediate supervisors who in turn should report the incident to Advice & Counsel, Asset Protection or Corporate Security. Colleagues should also report imminent threats and acts of violence to the The ERR, Emergency Response and Resilience Line at 888-464-296024 hours a day, 7 days a week ERR personnel are well-trained to intercept calls related to Workplace Violence and to respond accordingly.

CVS Health will take corrective action, up to and including termination of employment, against any colleague found to have violated this policy. CVS Health may also seek the prosecution of those who engage in violence on its premises or against its colleagues who violate this policy.

## **D. Shoplifting and Robberies**

Our main concern when robberies and shoplifting incidents occur is safety.

In the unlikely event of a robbery, cooperate fully and completely. Do not fight with, threaten or try to argue with someone who is engaged in a robbery. Do not ever chase a customer or physically try to stop a customer who is engaged in a robbery. Your goal should be to keep the encounter as short and uneventful as possible in order to ensure that everyone present remains safe.

In the event of a robbery:

- Remain calm, and cooperate fully with the robber to ensure your safety and the safety of others;
- If possible, note as many characteristics of the robber as you can, but only if you can do so safely – again, safety is the most important thing;
- Call the police as soon as you can do so safely; and
- After the robbery is over, seek emergency help as needed. Call the police and your supervisor immediately and give a detailed description of the incident.

If you see someone shoplifting, or you suspect that someone is shoplifting, you should tell your supervisor and/or Asset Protection personnel immediately, so that they can address the situation according to CVS Health protocol. Do not ever try to chase a shoplifter or physically try to stop them.

Many robberies and shoplifting incidents can be prevented by practicing good customer service, and making it obvious that CVS Health colleagues are paying attention. However, if a robbery or shoplifting incident happens, your goal must always be to keep yourself, your colleagues and your customers as safe as possible.

## **E. Tobacco Free Work Environment**

CVS Health is dedicated to providing a healthy, comfortable, and productive work environment for colleagues, contractors, vendors and visitors.

The use of tobacco, e-cigarettes and other nicotine-ingestion methods, except where approved by the FDA for smoking cessation purposes, is prohibited within

all CVS Health facilities, including stores, distribution centers and corporate campuses.

You may not smoke outside entrances to any facility, whether owned and operated by CVS or not, where it will affect customers and colleagues who are using those entrances. In shared facilities not owned by CVS, Smoking is only permitted where there is a designated smoking area outside the facility. If no smoking area has been designated at your facility, ask your supervisor for information about an appropriate smoking area outside of the facility.

If you are a smoker and would like to quit, please contact My EAP for You. You may also obtain smoking cessation information at Minute Clinic or by speaking with a CVS Health pharmacist. If you have a complaint about a potential violation of the tobacco policy, please inform your supervisor.

## **F. Drugs & Alcohol**

CVS Health is committed to maintaining a safe and productive work environment for all colleagues. Colleagues who work while under the influence of drugs or alcohol present a safety hazard to themselves and to others including our colleagues, customers and patients. Moreover, the presence of drugs and alcohol in the workplace limits a colleague's ability to perform at the highest levels and to provide our customers with the best possible customer service.

The company prohibits the possession, transfer, sale, use or solicitation of illegal drugs or being under the influence during working hours while on company property (including parking lots) or on company assignment.

Use, possession, sale or exchange of alcohol on company premises or at any time when representing the company is strictly prohibited, except when associated with an approved business meal or legitimate business event specifically authorized by management. Colleagues who choose to drink alcoholic beverages at company functions or among colleagues at non-work functions are expected to consume alcohol in moderation and behave in accordance with usual business standards and all company policies.

The company also prohibits colleagues from being under the influence of any legal drug (including legally prescribed drugs) during working hours or on company property (including parking lots) to the extent that such use or influence adversely affects an individual's ability to properly and safely perform his or her job duties.

If you are currently employed as a pharmacist, truck driver, heavy machine equipment operator, or other safety sensitive position and are taking prescription medication that may affect your ability to perform your job safely you are required to notify your supervisor. If you are employed in a non-safety sensitive position, you should still report the use of prescription medication if you are experiencing any side effects.

Colleagues who violate the CVS Health Alcohol & Drug Policy may be subject to disciplinary action, up to and including termination, even for a first offense.

### **1. Investigations and Inspections**

Colleagues are expected to cooperate fully in any interviews or investigations of possible violations of the CVS Health Alcohol & Drug Policy. When investigating

possible violations of this policy, the company reserves the right to require a colleague, while on duty or on company property (including the parking lots), to agree to inspections of his or her person, uniform, vehicle, locker, packages, handbag or personal property. Such inspections will be conducted in a manner that is not discriminatory, arbitrary, or capricious.

A colleague's refusal to consent to such an inspection or to otherwise cooperate in an investigation conducted under this policy is grounds for disciplinary action up to and including termination.

## **2. Testing**

Consistent with applicable law, applicants for designated positions to whom the company has extended a conditional offer of employment or promotion will be required to take a drug test to determine the presence or absence of illegal drugs.

Applicants whose screen and confirming tests are positive will be ineligible for employment with the company but may reapply and be considered for employment any time after six (6) months following the date of the failed test.

Colleagues may be required to submit to a test for the presence of alcohol or drugs whenever management has a reasonable suspicion that a Colleague is under the influence of alcohol or drugs or is otherwise in violation of the Company's drug or alcohol rules. A Colleague's failure to provide a specimen for such a test upon request may result in disciplinary action, up to and including termination of employment.

Finally, drivers subject to certain state and federal regulations will be tested in accordance with the Drug & Alcohol Policy for Commercial Motor Vehicle Drivers.

## **3. Employee Assistance Program**

The company EAP program, "My EAP," can assist colleagues with alcohol or drug-related problems including finding the appropriate treatment for rehabilitation and recovery. My EAP for You can be accessed 24 hours a day, seven days per week, by calling 800-789-8990, downloading the mobile app, or logging on at [www.myeapCVSHealth.com](http://www.myeapCVSHealth.com).

Please note that a colleague's participation in the EAP may not prevent the imposition of disciplinary action.

For more information on this topic, please refer to CVS Health's Alcohol and Drug Policy.



## VII. Leaving CVS Health

We hope your work at CVS Health is rewarding for you and for the company. We also recognize that there are times when it is necessary to end a relationship in order to move forward. Either you or the company may choose to end your employment at any time. If you decide to leave CVS Health, please notify your supervisor at least two weeks before the last day you plan to come to work. CVS Health may at its discretion waive some or all of any notice period.

If after you leave CVS Health, a third-party need to verify details of your employment, please inform the verifier that CVS Health uses a vendor, Thomas and Company, for this function. Give the verifier your Social Security Number and the CVS Health Employer Code (CVS121) MinuteClinic Colleagues (CVSMIN2), and ask the verifier to contact Thomas and Company by phone (1-800-791-8943) or on-line (Thomas-and-Company.com).

# Acknowledgement

## Colleague Handbook Receipt and Verification

This Colleague Handbook describes important information about CVS Health. I acknowledge and understand that:

- I am responsible for reading the Handbook, familiarizing myself with its contents and adhering to all of the rules, standards and expectations of CVS Health, whether set forth in this Handbook, the Code of Conduct, company policies, manager instructions or elsewhere;
- I will adhere to our compliance program, including compliance with Federal Health Care program requirements (as applicable to my role within the Company), and will commit to the highest standards of integrity. I will take ownership for my role in compliance efforts as a demonstration of our core behaviors and commitment to do the right things for our patients, customers, colleagues and shareholders.
- This handbook does not in any way create a contract of employment between the company and me;
- As a colleague at-will, either I or the company can decide to terminate the employment relationship at any time, with or without cause or notice, for any lawful reason;
- The company and all plan administrators shall have the maximum discretion permitted by law to interpret, administer, change, modify or delete company rules, guidelines, policies and benefits at any time, with or without notice;
- Any delay or failure by the company to enforce any work policy or rule will not constitute a waiver of the company's right to do so in the future;
- Nothing in this Handbook impacts or limits my existing rights under federal, state and local law, including my right to engage in protected, concerted activity under the National Labor Relations Act; and
- If I have any questions about any subject described in this Handbook or any other workplace topic, I will raise the matter with my supervisor, the Advice & Counsel or another appropriate company contact.

# CVS Health Resource Guide

## Heart At Work Behaviors™

[Heart At Work Recognition®](#)

[Heart At Work Resource Center](#)

## Benefits:

1-888-MY-HR-CVS “option 2”

Web site: [myHR.cvs.com](http://myHR.cvs.com)

## My EAP:

800-789-8990

[www.myeapCVSHealth.com](http://www.myeapCVSHealth.com)

## Electronic Federal & State Posters:

This site is for all colleagues to access and view mandatory Federal, State, and City posters.

<http://sharepoint/sites/LaborRelations/posters/State%20Posters/Forms/AllItems.aspx>

## Advice & Counsel

888-694-7287 (888-MY-HR-CVS)

M-F: 8:30 a.m. – 6:30 p.m. ET

[www.myac.cvshealth.com](http://www.myac.cvshealth.com)

## Ethics Line (Confidential):

877-CVS-2040 (877-287-2040)

Alternatives to Calling:

- Confidential e-mail address: [Ethics.BusinessConduct@CVS.com](mailto:Ethics.BusinessConduct@CVS.com)
- Confidential fax: 1-847-559-3835
- Confidential mailing address:

David Falkowski  
Chief Compliance Officer  
CVS Health  
One CVS Drive  
Woonsocket, RI 02895

### **Leave of Absence information:**

1-888-MY-HR-CVS

Web site: [myHR.cvs.com](http://myHR.cvs.com) and select the myLeave link

### **Payroll:**

1-888-MY-HR-CVS

Web site: [myHR.cvs.com](http://myHR.cvs.com)

### **Retirement Information:**

1-888-MY-HR-CVS

Web site: [myHR.cvs.com](http://myHR.cvs.com)

### **Health – Corporate Security Operations Center (CSOC)**

1-866-300-0475 [Corporate.Security@CVSCaremark.com](mailto:Corporate.Security@CVSCaremark.com)

### **Health – IT eSupport (Frontline Services)**

1-800-773-4003 (972) 813-3888

[ITServiceCenter.West@CVSCaremark.com](mailto:ITServiceCenter.West@CVSCaremark.com)

### **For privacy complaints:**

This is for colleagues and the public to report privacy issues, complaints, or concerns.

[CVS Health Privacy Office](#)

One CVS Drive

Woonsocket, RI 02895

1-866-443-0933

[Privacy.Officer@CVSHealth.com](mailto:Privacy.Officer@CVSHealth.com)