NOTICE FOR Novant Health, Inc. – SPONSORED WELLNESS PROGRAM (Novant Health Premier Plan, Blue Standard Plan, and Blue Premium Plan Members) (Revisions Effective January 2026)

The Novant Health Well-being Program is a voluntary wellness program offered under the Novant Health, Inc. Group Benefit Plan (the "Plan") that is available to all team members and certain spouses participating in the Blue Cross NC medical benefit options under the Plan. The Novant Health Well-being Program is administered by Navigate Wellbeing Solutions. Team members who enroll in the Premier, Standard or Premium medical plans administered Blue Cross NC will have access to the Novant Health Well-being Program and the Novant Health well-being portal. The Novant Health Well-being Program is administered according to federal rules permitting employer-sponsored wellness programs that seek to improve employee health or prevent disease, including the Americans with Disabilities Act of 1990, the Genetic Information Nondiscrimination Act of 2008, and the Health Insurance Portability and Accountability Act, as applicable, among others. If you choose to participate in the wellness program you will have the option to complete a voluntary health assessment or "HA" that asks a series of questions about your health-related activities and behaviors and whether you have or had certain medical conditions (for example, cancer, diabetes, or heart disease). You also have the option to submit biometric values which could include LDL cholesterol and fasting blood sugar values, as well as values for your blood pressure and Body Mass Index (BMI). You are not required to complete the HA or to submit biometric values or complete other medical examinations.

However, team member subscribers and covered spouses who choose to participate in the wellness program will receive an incentive for completing these activities, determined by Novant Health, for completing certain wellness program activities. All Well-being Program incentives are in the form of Novant Health contributions to your Health Reimbursement Account under the Plan. The maximum incentives for all wellness activities under Well-being Program are up to \$900/year for covered team member subscribers and \$275/year for covered spouses.

Although you are not required to complete the HA, submit biometric values, or complete other medical examinations, team members who are both enrolled in Blue Cross NC medical plan and complete the HA will receive a \$100 employer contribution to their Health Reimbursement Account (HRA). If the spouse of an eligible team member completes the HA, you will receive an additional \$30 contribution to your HRA.

Additional incentives for eligible Blue Cross NC enrollees (ranging from \$25 to \$175 for team member activities and from \$20 to \$60 for spouse activities) may be available for team members and spouses who participate in certain health-related activities (for example, preventive care appointments, online and telephonic lifestyle programs, exercise activities, and Novant Health living healthy events and webinars) or achieve certain health outcomes (such as a healthy BMI, blood pressure, LDL cholesterol, and fasting blood sugar). Covered spouses can also earn a \$20 incentive for receiving a flu vaccine.

For all eligible Blue Cross NC participants — If you think you might be unable to meet a standard for a reward under this wellness program, you might qualify for an opportunity to earn the same reward by different means. Contact the Human Resources Solution Center at 800-890-5420 and they will work with you and, if you wish, with your doctor, to find a wellness program with the same reward that is right for you in light of your health status.

<u>For participants who may have an impairment</u> – If you are unable to participate in any of the program events, activities or goals, you may be entitled to a reasonable accommodation for participation, or an alternative standard to earn rewards. For work-site accommodations please contact the Novant Health Human Resources Solution Center at 800-890-5420.

The information from your HA and the results from your biometric screening will be used to provide you with information to help you understand your current health and potential risks and may also be used to offer you services through the wellness program, such as online coaching, telephonic coaching, or other similar services. You also are encouraged to share your results or concerns with your own doctor.

Protections from Disclosure of Medical Information

We are required by law to maintain the privacy and security of your personally identifiable health information. Although the wellness program and Novant Health, Inc. may use aggregate information it collects to design a program based on identified health risks in the workplace, the Novant Health Well-being Program will never disclose any of your personal information either publicly or to the employer, except as necessary to respond to a request from you for a reasonable accommodation needed to participate in the wellness program, or as expressly permitted by law. Medical information that personally identifies you that is provided in connection with the wellness program will not be provided to your supervisors or managers and may never be used to make a decision regarding your employment.

Your health information will not be sold, exchanged, transferred, or otherwise disclosed except to the extent permitted by law to carry out specific activities related to the wellness program, and you will not be asked or required to waive the confidentiality of your health information as a condition of participating in the wellness program or receiving an incentive. Anyone who receives your information for purposes of providing you services as part of the wellness program will abide by the same confidentiality requirements. The personally identifiable health information that the Novant Health Well-being Program receives will only be used by a health coach or medical professional in order to provide you with services under the wellness program.

In addition, all medical information obtained through the wellness program will be maintained separately from your personnel records, information stored electronically will be encrypted, and no information you provide as part of the wellness program will be used in making any employment decision. Although no one can prevent all cyber-attacks, the Novant Health Well-being Program has information security programs consisting of people, process, and technology—including encryption and monitoring tools designed to protect electronic information. We maintain safeguards intended to protect the security of your information. In the event a data breach, as defined by law, occurs involving information you provide in connection with the wellness program, we will notify you as required by law.

You may not be discriminated against in employment because of the medical information you provide as part of participating in the wellness program, nor may you be subjected to retaliation if you choose not to participate.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please contact Novant Health Human Resources Solution Center at 800-890-5420.

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