

**Issued by:** Human Resources  
**Approval:** VNA Policy Review Committee

**PP No:** HR\_140  
**Revision No:** 1.1  
**Effective Date:** 15 Apr 2026

**SUBJECT: Employee Return to Work from Non-Work-Related Injuries and Illnesses (U.S. Only)**

**1.0 SCOPE**

This Veolia North America (VNA) policy applies in its entirety to all non-union United States employees and United States locations of Veolia North America (“Company”). This policy applies to union represented employees to the extent that this policy does not conflict with the terms and conditions of the applicable collective bargaining agreement. For clarity, where there is a dispute involving the interpretation or the application of this policy and the collective bargaining agreement, the terms of the collective bargaining agreement shall prevail.

This policy also does not apply to employees who are seeking reasonable accommodations due to known limitations related to, affected by, or arising out of pregnancy, childbirth, or related medical conditions. For further information on reasonable accommodations related to, affected by, or arising out of pregnancy, childbirth, or related medical conditions, please see HR 154 Pregnant Workers Fairness Act (PWFA) Policy.

As we operate in multiple states, for the purpose of brevity, we cannot list every situation where laws may differ from the requirements of this policy. If there is a difference between this policy and applicable law, then the law always governs.

Nothing in these policies should be construed to limit an employee’s right to engage in any activity protected under applicable law, including but not limited to, Section 7 of the National Labor Relations Act.

**2.0 PURPOSE**

The purpose of this policy is to establish a uniform understanding about how the Company facilitates employee return to work following a significant non-work-related injury or illness. It is the Company’s goal to return employees to work as soon as practical.

The Company does not discriminate against employees on the basis of disability and complies with the Americans with Disabilities Act (ADA) and similar applicable state and local laws. More specifically, the Company does not discriminate against employees who are actually disabled and those employees who have a history or record of a disability or who are perceived by others as disabled.

**3.0 RESPONSIBILITIES**

Each employee is responsible for adhering to this Policy. All Managers are responsible for ensuring that this Policy is properly followed.

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### **4.0 REFERENCES AND FORMS**

Employee Handbook Section 2.2: Reasonable Accommodation and Interactive Dialogue  
HR\_140.01 - [Return to Work Release Form \(US Only\) \(PDF\)](#)

### **5.0 DEFINITIONS**

**Significant Non-Work-Related Injury or Illness:** Any of the following events:

- The employee misses three (3) consecutive scheduled work days (not including scheduled on-call time) for a medical or health reason that may impact their ability to adequately or safely perform any job function;
- The employee is absent from work for one or more days as the result of a surgical procedure and the surgical procedure is in treatment of a medical or health condition that may impact their ability to adequately or safely perform any job function;
- The employee has been prescribed a medication that may impact their ability to adequately or safely perform any job function; and
- The employee has been diagnosed with a medical, psychological or psychiatric condition that may impact their ability to adequately or safely perform any job function.

### **6.0 GUIDELINES**

This policy sets forth the return-to-work steps required for employees who have had a significant non-work-related injury or illness.

- 6.1** The employee must coordinate their return-to-work date with the Company's disability & leave administrator (currently Lincoln Financial Group) as soon as reasonably possible as to when the employee expects to return to work. The employee must also notify their Human Resources representative (e.g., HR Business Partner).
- 6.2** The employee should contact these parties as soon as any restrictions are known, at a minimum of five (5) calendar days in advance of returning to work, to ensure appropriate planning can take place. In case of an emergency where a five (5) calendar day notice is not feasible, the employee will strive to inform the Company's Human Resources Department (e.g., HR Business Partner) as soon as practically possible before returning to work.
- 6.3** The employee must return a fully completed Return to Work Release Form (HR 140.1) signed by their physician to the Company's Human Resources Department (e.g., HR Business Partner) five (5) calendar days prior to their return. It is the employee's responsibility to obtain the completed form from their physician. In case of an emergency where a five (5) calendar day notice is not feasible, the employee will strive to inform the Company's Human Resources Department (e.g., HR Business Partner) as soon as practically possible before returning to work.

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- 6.4** The Company's Human Resources Department will review the completed Return to Work Release Form (HR 140.1) to determine, in consultation with the Company's Environmental Health and Safety (EHS) Department and the employee's supervisor, if the employee can safely return to work with or without restrictions or accommodations. In general, the Company will accept the employee's Return to Work Release Form as provided and endeavor to return the employee to work within the employee's restrictions, if any, provided that in doing so the employee does not endanger the employee's or others' health and safety. Under limited circumstances, and after the employee has been returned to work, the EHS Department, in coordination with Company's Human Resources Department (e.g., HR Business Partner) and the employee's supervisor, may involve a 3rd party Occupational Healthcare provider, or another Company representative in making the decision, if applicable to the circumstances and also permissible under applicable law. These limited circumstances generally involve observed situations where an employee has unaddressed limitations that may impact their ability to work safely, a demonstrated inability to currently work safely, or is unable to perform essential job functions, and Veolia has reason to believe that a health issue is causing the difficulties. Time spent completing the functional exam will be compensable.
- 6.5** If an employee does not provide a properly completed filled and signed Return to Work Release Form, the Company has the right to send the employee for a physical through its medical provider (WorkCare). Time spent completing the functional exam will be compensable. An employee will not be allowed to return to work without a properly completed filled and signed Return to Work Release Form or clearance from the Company's medical provider, in lieu of a completed Return to Work Release Form.
- 6.6** It is the employee's responsibility to inform their manager on their actual day of return to work.
- 6.7** It is the employee's manager's responsibility to confirm an employee's return to work within 1 business day to ensure timely employee pay.
- 6.8** If the employee's significant non-work-related injury or illness does require accommodation upon their return, the Company will engage the employee in an interactive process for the purposes of providing the employee with a reasonable accommodation. The Company's Human Resources Department will coordinate the Accommodations process and may involve other Company departments including, but not limited to the employee's supervisor and EHS. See Employee Handbook Section 2.2: Reasonable Accommodation and Interactive Dialogue

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**6.8.1** An accommodation shall be reasonable and offered to the employee unless there is no reasonable accommodation that allows the employee to perform the essential functions of the job, or that eliminates any direct threat to the employee or others, or if the only effective accommodations pose an undue hardship on the Company. A direct threat means that a significant risk of substantial harm to the health and safety of the person or others exists and that risk cannot be eliminated or reduced through reasonable accommodations.

**6.8.2** Human Resources is the only department with authority to deny an accommodation. All denials must be communicated to the employee by Human Resources. Failure to follow this policy will result in disciplinary action up to and including termination of employment.

### **7.0 RECORDS**

Records should be retained by the appropriate functional area in compliance with the applicable record retention policy.

### **8.0 COMMUNICATION TO AFFECTED EMPLOYEES**

All Employees	Email distribution, intranet
All HR Employees	Webinars, email, intranet

### **9.0 POLICY TERMINATION AND/OR AMENDMENT**

The Company reserves the right to amend or rescind, in whole or part, this procedure at any time and without notice. This procedure does not constitute a contract of employment or a promise of benefits or continued employment.

### **10.0 REVIEW AND APPROVAL**

<b>Reviewer/Title</b>	<b>Revision No.</b>	<b>Review Date</b>
Human Resource Leadership Team	1.0	15 Dec 2015
General Counsel- Employment and Labor	1.0	15 Dec 2015
VNA Policy Review Committee	1.0	22 Jan 2016
Hesham Sheikh, Director - Employee Benefits, North America, Human Resources	1.1	20 Feb 2026
Kanwer Khan,	1.1	20 Feb 2026
Katie Crawford, VP, Asst. General Counsel, Labor and Employment	1.1	20 Feb 2026
VNA Policy Review Committee	1.1	27 Feb 2026

<b>Approved by:</b>	VNA Policy Review Committee
<b>Date:</b>	01 Apr 2026

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### **11.0 CHANGE HISTORY**

<b>Revision No.</b>	<b>Summary of changes</b>	<b>Issue Date</b>	<b>Effective Date</b>
1.0	Initial issuance	22 Jan 2016	31 Jan 2016
1.1	Revised to update and clarify process	02 Apr 2026	15 Apr 2026