

COVID 19 VACCINATION POLICY

(The Company) is committed to taking every reasonable precaution in the circumstances for the protection of the health and safety of workers from the hazard of COVID-19 as required by the Occupational Health and Safety Act (OHSA). This Policy is intended to encourage, support and maximize COVID-19 Vaccination rates and safety at our workplaces as one of the critical preventatives and control measures for the hazard of COVID-19 in the workplace. The company is also committed to compliance with all applicable public and occupational health and safety, human rights, privacy, and other laws in the development and implementation of this Policy.

Purpose

The purpose of this policy is to outline company expectations with regards to COVID-19 immunization of employees, staff, contractors, volunteers and students.

Scope

This Policy applies to all company employees, workers and contractors that will or may be required to perform work for the company or who are representing the company in any capacity.

Definitions

Company Business - all business activities related to company operations, whether conducted on or off company premises. It does not include work performed remotely from the covered employee's own home.

Company premises - includes, but is not restricted to, all land, property, structures, installations, vehicles or equipment owned, leased, operated, used, or otherwise controlled by the company for the purpose of conducting company business. It does not include a covered employee's own home.

COVID-19 - an infectious disease caused by SARS-CoV-2, a highly contagious virus.

Vaccine - a vaccine approved by Health Canada for use in Canada in relation to COVID-19.

Vaccination - the administration of a vaccine(s) to protect individuals from COVID-19. It may include the administration of one or more doses of vaccine.

Vaccinated - an individual who has received all recommended doses of a vaccine recommended or required to produce an immune response to COVID-19.

Policy

The Company ABC recommends vaccination for all employees. In accordance with the approval by Health Canada, the recommendations of the federal and provincial governments, the Public Health Agency of Canada, regional public health authorities, the Canadian Medical Association, management strongly encourages all employees to voluntarily receive a COVID-19 vaccination who may safely receive the vaccine. Everyone with questions regarding the benefits, risks and precautions for vaccines is encouraged to speak with their healthcare professional.

To facilitate this policy all employees, staff, contractors, volunteers and students will be required to provide one of the following:

- 1 Proof of COVID-19 vaccine administration as per the following requirements:
 - a) If a worker has only received the first dose of a two-dose COVID-19 vaccination series approved by the World Health Organization proof that the first dose was administered and, as soon as reasonably possible, proof of administration of the second dose.
 - b) Proof of all required doses of a COVID-19 vaccine approved by the World Health Organization
- 2 Written proof of a medical reason, provided by either a physician or nurse practitioner that sets out:
 - a) That the person cannot be vaccinated against COVID-19, *and*
 - b) The effective time period for the medical reason (i.e., permanent or time-limited).
- 3 Proof that the individual has completed an educational program approved by the company. Refer to the section "Education Program" below.

Employees who elect not to provide proof of COVID-19 vaccination per 1 above, and rely on 2 or 3, are required to perform rapid antigen testing, at a frequency of not less than weekly in alignment with provincial guidance, and provide verification of negative test results as specified by the company (e.g., in person on the worksite, remotely via email or app)

Proof of Vaccination

After vaccination, individuals with an Ontario photo health card can log in to the provincial portal to download or print an electronic COVID-19 vaccine receipt (PDF) for each dose received. Receipts are available:

- For first and second doses received in Ontario regardless of where you were vaccinated in Ontario (for example, at a mass immunization clinic, hospital, pharmacy, or primary care setting)
- For doses received out of province, if reported to the local public health unit (and if approved international vaccines)

Proof of a Medical Reason for Not Being Vaccinated

There are likely to be very few medical exemptions to COVID-19 vaccination. The largest group of individuals who receive a medical exception will be those with severe allergic reactions or anaphylaxis to a previous dose of a COVID-19 vaccine or to any of its components and who have been assessed by an allergist/ immunologist to review methods for possible (re)administration of a COVID-19 vaccine. There are existing protocols to administer COVID-19 vaccines to individuals with other types of allergies. These other types of allergies do not on their own constitute the grounds for a medical exemption.

- Individuals who have had an allergic reaction within 4 hours and/or anaphylaxis that occurred with a vaccine or injectable medication that does not contain a component or cross-reacting component of the COVID-19 vaccines can receive the COVID-19 vaccine followed by observation for a minimum of 30 minutes.
- Individuals with a history of significant allergic reactions and/or anaphylaxis to any food, drug, venom, latex or other allergens not related to the COVID-19 vaccine can receive the COVID-19 vaccine followed by observation for a minimum of 15 minutes. Individuals with allergy issues like allergic rhinitis, asthma and eczema can receive the vaccine followed by observation for a minimum of 15 minutes

Educational Program

The educational program must be approved by The Company ABC and will be required to address all of the following learning components:

- How COVID-19 vaccines work.
- Vaccine safety related to the development of the COVID-19 vaccines
- Benefits of vaccination against COVID-19
- Risks of not being vaccinated against COVID-19
- Possible side effects of COVID-19 vaccination
- Provide a certificate of completion of other method providing completion of the course

Disclosure of Information

The company reserves the right to disclose limited vaccination status information, such as the fact that an employee is vaccinated and the date of vaccination, to clients for the purposes of facilitating client engagement, contractual obligations and verification, and will provide advance notice to the relevant employee.

Accommodation

The company is committed to a workplace free from discrimination and harassment in accordance with Ontario human rights laws. The company will accommodate employees from the strict application of this Policy who qualify based on one or more of the protected grounds of discrimination in the Human Rights Code up to the point of undue hardship.

Employees seeking accommodation are required by law to self-identify the specific prohibited ground of discrimination they believe vaccination would infringe and also participate in the accommodation process, including, but not limited to, providing information to establish the existence of a protected grounds, related restrictions and possible methods of accommodation. To discuss possible exemptions and related accommodation under this Policy, eligible employees should contact management.

Privacy

Vaccination status information will be collected, used and disclosed pursuant to the terms of this Policy. Vaccination status information will only be collected, used and disclosed as required for the reasonable purpose of:

- Taking all reasonable precautions during the pandemic to ensure the health and safety of everyone in the workplace through appropriate health and safety planning based on vaccination status
- Limited disclosure to company clients as required by the terms of the service relationship or when determined to be necessary or required by law by the company
- Administering this Policy.

The company also reserves the right to disclose limited vaccination status information, such as the fact that an employee is vaccinated and the date of vaccination, to clients for the purposes of facilitating client engagement, contractual obligations and verification, and will provide advance notice to the relevant employee.

Responsibilities

Management of the company are responsible for the administration of this Policy in accordance with applicable law. Employees are responsible for compliance with this Policy and are to comply with all applicable legal obligations in doing so, including with respect to public health measures such as physical distancing, wearing a mask and staying home if they are sick.

Authorization

The company will review this policy and update it as required and as reasonable in the evolving nature of the pandemic, vaccine availability and government and public health authority direction.

Timelines

The Vaccine Policy will be implemented Wednesday, September 15, 2021. To comply with the policy, employees who are not yet vaccinated or not yet fully vaccinated must:

- Have received their first dose no later than September 22, 2021
- Have received their second dose no later than October 22, 2021
- Be fully vaccinated by November 8, 2021