

## **All Policies and Procedures in Compliance with OSHA ETS issued on November 4, 2021**

### **Vaccine Mandate or Test Policy**

*The Companies are required by federal law - specifically, OSHA - to adopt a vaccine or test policy effective January 10, 2022. **To be clear, the Companies have no choice.** This is a mandate.*

All employees of all companies in all locations will be required to be vaccinated. For purposes of the OSHA ETS, “vaccinated” means one J&J vaccine dose, or two doses of the Pfizer or Moderna vaccines. The OSHA ETS does not address booster shots.

If an employee is not vaccinated, and is not working 100% remote or 100% offsite, that employee will be required to get a COVID-19 test on a weekly basis. This means that employee will be required to get tested at least once every 7 days and provide documentation of the test result to HR no later than the 7<sup>th</sup> day following the date on which the employee last provided a result. Any form of test is acceptable provided it is done by a medical/pharmaceutical third party – it cannot be self-administered (i.e., no self-testing with a rapid test). Proof must be timely uploaded to the ADP portal as described in a separate memorandum. Please contact HR if you have any questions or concerns regarding the process.

If an unvaccinated employee decides to get vaccinated, that employee will have up to 4 hours of paid time to receive primary vaccination doses as well as reasonable time and paid sick leave to recover from side effects (time and sick leave is addressed in more detail below).

### **Process to Determine Vaccination Status**

All employees are presumed unvaccinated unless and until proof of vaccination is given to HR. Proof consists of the following:

1. Record of immunization from a health care provider or pharmacy
2. Copy of the U.S. COVID-19 Vaccination Record Card
3. Copy of medical records documenting the vaccine
4. Copy of immunization records from a public health, state, or tribal immunization information system
5. Copy of any other official documentation that contains the type of vaccine administered, dates of administration, and the name of the health care professionals or clinic sites administering the vaccine

In the event an employee cannot obtain the foregoing proof, the Companies will accept an attestation on a form to be prepared by the Companies. Please contact HR for further details on the attestation form that includes a declaration under oath and in the event of a false statement regarding vaccination status, subjects the employee to criminal penalties. Proof of vaccination shall be uploaded to the ADP portal as set forth in a separate memorandum. Please contact HR if you have any questions or concerns regarding the process.

### **Time and Leave to Obtain Vaccinations and Deal with Side Effects**

Each employee will be entitled to 4 hours of paid time to obtain initial vaccinations. Each employee will be entitled to reasonable time to deal with side effects of vaccination, if any. To the extent that any employee has accrued paid sick leave time, the Company may require (depending on which state you reside) that employee to use that paid sick leave when recovering from side effects experienced following a primary vaccination dose. Each employee should speak with HR regarding the foregoing.

### **Procedures to Follow Regarding Positive COVID-19 Test**

Notify HR immediately and follow the most recent COVID-19 Protocol as of January 10, 2022 memorandum issued by the Companies.

### **Procedures to Request Records of Vaccinations**

Employees are entitled to request copies of their own vaccination status and testing results from HR. Employees are also entitled to a report showing (i) the aggregate number of fully vaccinated employees in the workplace, and (ii) the total number of employees at the workplace. Any employee requesting such records should contact HR