

COVID-19 Vaccination Policy

PARAGON PROTECTION LTD. ("the Company") is committed to promoting and preserving a safe working environment for various parties. In pursuit of this goal, the Company has created a COVID-19 Vaccination Policy (the "Policy") to take affirmative steps to minimize potential incidents of COVID-19 in the workplace. This Policy sets out the responsibilities of the various parties.

The Policy is guided by the requirements of the *Occupational Health and Safety Act* of Ontario and the Ontario *Human Rights Code and* will be interpreted in accordance with both statutes.

The Policy is effective immediately but may be amended by the Company as public health guidelines/requirements change, including but not limited with respect to the number of vaccine doses recommended by relevant government agencies. All Staff of the Company are required to review and adhere to the contents of the Policy.

I. DEFINITIONS

<u>Accepted Vaccine</u>: a vaccine approved for use by Health Canada and/or the World Health Organization intended to provide acquired immunity against severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2), the virus causing coronavirus disease 2019 (COVID-19).

<u>Fully Vaccinated</u>: fourteen (14) days after receiving the total number of required doses of an Accepted Vaccine.

<u>Staff</u>: refers to all employees (permanent and temporary), contract staff, supervisors and managers of the Company.

<u>Workplace</u>: all premises and locations where staff are required to be located in the performance of work or services for, or on behalf of, the Company, including but not limited to the sites of the Company's clients or prospective clients.

II. SCOPE

This Policy applies to all Company Staff.

III. SAFETY GUIDELINES FOR THE WORKPLACE

All Staff are expected to help maintain a safe and healthy workplace. The rules below are not all inclusive and they are not the only steps that Staff must take towards keeping our Workplace safe. In pursuit of this goal, Staff are expected to take all reasonable steps to maintain a safe and healthy Workplace, even if those steps are not specifically listed below, using their best judgment.

A. Protect yourself and others:

- Until further notice, staff will be required to wear disposable or cloth masks while in the Workplace, including but not limited to, while in common spaces and washrooms, except to the extent that an exemption has been granted by an authorized member of Company management. Where practicable, the Company will make disposable masks available to Staff upon entry into the workplace; however, Staff are asked and encouraged to bring their own masks to the Workplace.
- Staff should not attend the Workplace if they are feeling sick, or have a probable COVID-19 infection, in accordance with the Company's other policies in this regard.

B. Scheduling Vaccinations

- All staff must by Fully Vaccinated by October 31, 2021. For a two dose vaccine series, employees must receive one dose of COVID-19 vaccine by September 30, 2021, and two doses of COVID-19 vaccine by October 31, 2021. For a single dose vaccine series (e.g. Johnson and Johnson), employees must receive the dose by September 30, 2021.
- Therefore, staff who are not yet Fully Vaccinated are required to schedule an appointment to obtain an Accepted Vaccine immediately, provided they are eligible for an Accepted Vaccine. Please coordinate with your supervisor, and if you cannot be Fully Vaccinated by the above-noted date, necessary arrangements will be made for employees on a case-bycase basis.

- If employees are assigned to a site that requires to be Fully Vaccinated on an earlier date than October 31st, 2021, that date will prevail.
- The Company will accommodate staff who are scheduled to obtain a vaccination during working hours. Please inform your scheduler if your vaccination appointment falls during working hours.
- All staff are required to provide a signed declaration confirming that they have had two doses of vaccination, by October 17th, 2021. The form will be sent electronically to all employees on the week of September 06th, 2021.

The Company reserves the right to ask staff for proof of their vaccination status.

 The Company will maintain vaccination disclosure information, including declarations forms and proof if required, in accordance with privacy legislation. This information will only be used to the extent necessary for implementation of this policy, for administering health and safety protocols, and infection and prevention control measures in the workplace.

C. Travelling Outside of Canada

- All non-essential travel outside Canada should be avoided, in accordance with public health guidelines.
- If you are required to travel outside of Canada for an essential reason, upon your return to Canada, you must follow all governmental rules and requirements regarding COVID-19 testing and self-isolation, if any.

IV. ATTENDANCE AT CLIENT SITES

To limit the number of people at any given client site, please ensure you do not bring or allow any unauthorized visitors on site.

Approved visitors and/or any other attendees must comply with the Policy, as well as all other client rules and regulations.

V. EXEMPTIONS

The company will consider on a case-by-case basis requests from Staff for exemptions.

To continue to protect the health and safety of the community while complying with human rights requirements, Staff with an approved exemption from being vaccinated may be accommodated to the point of undue hardship. However, these Staff members, at the complete discretion of the Company and depending upon the circumstances:

- may need to be placed at a different site where the Company performs services, at the prevailing rate of pay for that site and position;
- may be required to participate in further Covid-19 testing requirements than other Staff;
- may be required to take an unpaid leave of absence; and/or
- may be subject to further requirements on a case-by-case basis.

Requests for medical exemptions will be considered upon completion and presentation of an approved Request for Medical Exemption form. Please speak to your supervisor as soon as possible if you need to obtain and complete this form. The Company reserves the right to have the form reviewed by applicable medical specialists.

Requests for creed/religion exemptions will be considered upon completion and presentation of the Company's Request for Creed/Religion Exemption form. The Company reserves the right to make the appropriate inquiries to verify the authenticity of a creed/religion-based claim.

The Company may also accommodate staff who have received the first dose of an accepted two-dose vaccine, during the recommended interval period between doses, and for 14 days after the second dose is administered. At the end of this interval period, the Company will cease accommodations, provided that Accepted Vaccines are reasonably available for those Staff.

Staff who are not Fully Vaccinated may be required to follow additional health and safety precautions not applicable to Fully Vaccinated individuals.

VI. RESPONSIBILITY AND ENFORCEMENT

Any Staff found to have violated or abused this Policy, and any individuals providing information pursuant to this Policy falsely or dishonestly, may be subject to disciplinary action in accordance with the Company's existing disciplinary policies, up to and including termination for just cause.