

VACCINATION POLICY

Purpose and Scope

COVID-19 vaccines have been approved by Health Canada and are available to all Canadians twelve years of age and older. According to public health information, COVID-19 vaccines are a safe method of giving individuals added protection against the effects of the COVID-19 virus and its variants and are an additional measure for limiting the risk of contracting and spreading the virus.

COVID-19 remains a serious health risk in our community. The ongoing spread of variants of concern means we must make every reasonable effort to protect our workplace against the virus. As we continue to provide services and return to working in the office, we must consider all infection control measures at our disposal to protect employees, our clients, and our community.

In accordance with legal requirements, public health guidelines, and our obligations to maintain workplace health and safety, Ricketts Harris LLP/RHK Management (the “**Firm**”) is incorporating employee vaccination status into our efforts to protect employees and our clients from COVID-19. This Vaccination Policy describes requirements for disclosure of vaccination status and alternatives to disclosure.

This policy applies to all employees of the Firm and all Counsel or Partners of the Firm (“**Firm Members**”).

Disclosure Requirements

As of September 30, 2021, Firm Members must:

- Show a copy of the Ontario Ministry of Health’s Proof of Vaccination Receipts provided to them for their first and second doses of the COVID-19 vaccine to Christl Mittendorfer.
- If the Firm Member has received only one dose of a two-dose COVID-19 vaccination approved by Health Canada, the Firm Member must, as soon as reasonably possible, show the Proof of Vaccination Receipt for the second dose to Christl Mittendorfer and provide confirmation that an appointment for a second dose has been booked.

As of October 22, 2021, Firm Members must update the Firm by no later than October 31, 2021 as follows:

- Show their COVID-19 vaccination QR code (the “**Vaccine Passport**”) to Christl Mittendorfer, who will scan the code using the Ontario government’s approved app.
- If the Firm Member refuses to show their Vaccine Passport, they must provide written confirmation from a physician or nurse practitioner that demonstrates:
 - that there is a legitimate medical reason that the Firm Member cannot be vaccinated against COVID-19; and
 - the effective time period for which this medical reason is expected to persist.

If the medical reason that a Firm Member cannot be vaccinated against COVID-19 is temporary, the Firm Member must provide confirmation of COVID-19 vaccination as soon as reasonably possible after that temporary period has ended.

If booster shots, third doses, or other recommendations are disseminated by Health Canada, the Firm will expect Firm Members to update their vaccination status within 7 days of receipt of another vaccine dose. The Firm reserves the right to update this policy and to otherwise request further proof of vaccination in accordance with public health guidelines and standard practice.

Accommodation

The Firm is committed to a workplace free from discrimination and harassment in accordance with Ontario human rights laws. The Company will provide accommodation from the strict application of this Policy to Firm Members who qualify based on one or more of the protected grounds of discrimination in the Ontario *Human Rights Code*, R.S.O. 1990, Ch. H. 19, up to the point of undue hardship.

Firm Members seeking accommodation are required by law to self-identify the specific prohibited ground of discrimination they believe vaccination would infringe and to 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 Firm Members should contact Christl Mittendorfer.

Visitor Vaccination Status Disclosure

Firm Members should discourage clients or other third parties from attending meetings in the office unless it is necessary and there is no feasible alternative method (i.e., Zoom meeting). If a Firm Member wishes to meet with a client or non-Firm Member at the Firm's office, the Firm Member must comply with the following steps:

1. Prior to September 22, 2021, ask the person to disclose their vaccination status prior to attending. Such disclosure is voluntary. If the person refuses to disclose their vaccination status, they will not be permitted to enter the Firm office.
2. On or after September 22, 2021, ask the person to provide their Proof of Vaccination Receipts and, after October 22, 2021, their Vaccine Passport at reception. Reception will be provided with the tools necessary to scan guests' Vaccine Passports.
3. Check with reception to confirm how many other non-Firm Members will be in the office at the same time and attempt to limit such attendance to two or fewer non-Firm Members.
4. Ask the person to complete the COVID-19 questionnaire at reception, which will include provision of their up-to-date contact information for contact tracing purposes.
5. Require the person to always wear a mask while in the office.

6. Limit the person's attendance in the office to as short a time as possible.
7. Maintain a 2-metre distance between yourself and this person.
8. Suggest meeting outdoors, if appropriate.

If the client or third party attends the Firm office and refuses to comply with these requirements, contact Christl Mittendorfer or an equity partner immediately. The client or third party may be asked to leave the office, depending on the circumstances.

Vaccination Supports

The Firm will provide the following supports for Firm Members subject to this policy who wish to receive a COVID-19 vaccine:

- Paid time off to receive a vaccine or to recover from temporary vaccine-related illness to a maximum of two (2) business days.
- Assistance with booking a vaccine appointment.
- At the Firm's discretion and where and when available, workplace vaccination clinics.

Immunization Information Session

At the Firm's discretion, the Firm may hold an immunization information session for all Firm Members who want more information about COVID-19 vaccination and changes to vaccine-related advice from public health authorities and other medical organizations (i.e., in respect of boosters, etc.).

Alternative Infection Control Measures

Firm Members who have not disclosed full COVID-19 vaccination status in accordance with this policy or who do not have full COVID-19 vaccination status will be required to adhere to the following alternative infection control measures:

- At the Firm's discretion, Firm Member who does not disclose their vaccination status **may** be required to work remotely for some or part of the work week.
- If the Firm Member's attendance at the office is required, they will be tested every fourth day. That Firm Member will be tested by a screening supervisor, who has obtained the necessary training in accordance with the applicable legislation.
- When attending the office, the Firm Member must use additional personal protective equipment and must strictly maintain social distancing from all Firm Members. The Firm Member must always wear a mask and face shield. These items will be provided by the Firm.
- Additional isolation in terms of the location of the Firm Member's workstation will be arranged with the Firm, at the Firm's discretion and direction.

Existing Infection Control Measures

The disclosure requirements and alternative infection control measures are in addition to the existing infection control measures the Firm has implemented in the workplace. All employees are still required to comply with requirements set out in the COVID-19 Policy and Guidelines (attached), which include:

- Complete the questionnaire at reception when you arrive at the office.
- Wash your hands often with soap and water for at least 30 seconds (singing the Happy Birthday song twice). If soap and water are not available, use alcohol-based sanitizer, which is provided throughout the office.
- Avoid touching your face (eyes, nose, and mouth) with unwashed hands.
- Wear a mask in the office (mandatory) and outdoors (if a 2-meter distance cannot be assured).
- Avoid close contact with people who are ill.
- Cover your cough or sneeze with a tissue (or cough/sneeze into your sleeve/arm), then immediately dispose safely of the tissue.
- Clean and disinfect touched objects (i.e., printers, mobile phone, keyboard, mouse, etc.) and surfaces frequently.
- DO NOT come to the office if you are ill!
- If you are diagnosed with COVID-19, alert Christl Mittendorfer immediately.

Non-Compliance

Compliance with this policy is critical to the Firm's efforts to control the risks of COVID-19 in the workplace. A Firm Member who fails to comply with this policy will not be permitted to attend the workplace and may be subject to discipline, including suspension without pay and other discipline up to and including dismissal.

Privacy

The Firm is committed to protecting the privacy and security of Firm Members' personal information. All information reported under this policy will be treated as confidential and will be used or disclosed only by Christl Mittendorfer for the purposes of administering infection control procedures in the workplace. All Firm Member personal information will be collected, used, and disclosed in accordance with the Firm's Privacy Policy.

Disclosure of Vaccination Status

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

1. 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;
2. limited disclosure to Firm clients as required by the terms of the applicable service relationship or when determined by the Firm, in its sole discretion, acting reasonably, to be necessary or required by law by the Firm; and
3. administering this Policy.

The Firm reserves the right to disclose limited vaccination status information, such as the fact that a Firm Member is vaccinated and the date of Vaccination, as is required by law and as is required by parties with whom the Firm contracts (i.e., building management, etc.). The Firm will provide reasonable advance notice to the relevant Firm Member of disclosure.

Administration of This Policy

The Firm will maintain and revise this Vaccination Policy as required in response to public health guidance and the evolving conditions of the COVID-19 pandemic. The Firm expressly reserves the right to change, modify or delete portions of this Policy without notice.

If you have any questions regarding this policy or any questions that are not addressed in this policy, you may contact Christl Mittendorfer.