

	POLICY	
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Owner: Director, Human Resources		
Title:	COVID-19 Safer Workplaces Policy	

1. Policy Statement

Purolator is committed to ensuring a safe and healthy workplace. As part of this commitment, and its legal obligation under the *Canada Labour Code*, Purolator has continuously updated its processes to keep our people and communities safe from the transmission of COVID-19 based on the most recent Public Health information.

This policy continues Purolator’s efforts to take precautions to deter the transmission of this virus and reducing harmful outcomes within its workplaces and the broader community. Vaccination is a key element in the protection of Purolator employees against the hazard of COVID-19. Purolator is committed to reducing the transmission of this virus and to reducing the most harmful outcomes of such infections within its workplaces and communities.

Consistent with current medical guidance and the Federal government’s direction, Purolator will require all eligible employees to be vaccinated against COVID-19.

2. Background and Current Situation

Vaccination has been shown to be highly effective in reducing COVID-19 virus transmission and protecting vaccinated individuals from severe consequences of COVID-19 and COVID-19 variants, including the Delta variant currently circulating in Canada. According to the Public Health Agency of Canada, the evidence demonstrates that a complete vaccination series provides substantial protection from infection.

Given the continuing spread of COVID-19, including the Delta variant, within Canada, the compelling data demonstrating a higher incident of COVID-19 among the unvaccinated population and the increasing levels of contact between individual as businesses, services and activities have reopened, it is important for Purolator employees to be vaccinated in order to protect themselves against serious illness from COVID-19 as well as to provide indirect protection to others, including colleagues.

3. Scope

This policy applies to all Purolator Inc. unionized and non-unionized employees, students, contractors that attend on site, temporary agency staff, and owner operators and their relief drivers.

The Policy will be reviewed at least once a quarter, and as required with changing Public Health recommendations.

4. Definitions

“Fully Vaccinated” means employees who have received a second dose of a two-dose series of a COVID-19 vaccine approved by PHAC, or a single-dose vaccine (i.e., Johnson & Johnson), at least fourteen (14) days prior to attestation submission. Other vaccine regimens will be considered on a case-by-case basis as reviewed by the Director of Labour Relations and Chief Medical Officer.

“COVID-19 testing” means completing either a rapid antigen or nasopharyngeal swab to determine if an individual has acquired COVID-19.

5. Vaccination Requirement

5.1 Timelines

All Purolator employees are required to be fully vaccinated with a COVID-19 vaccine series by October 1, 2021.

5.2 Attestation of Vaccination

Purolator will require employees to attest to their vaccination status in accordance with the established process by no later than September 20, 2021.

Employees will be required to update their vaccination status in accordance with the established process and by the dates set out in this policy, as they obtain each dose of COVID-19 vaccine.

6. Roles and Responsibilities

All Purolator employees have a role to play in ensuring a safe and healthy workplace, free of COVID-19. However, the following groups have the following defined responsibilities:

6.1 Leadership Team

The President and CEO and the senior members of the Leadership Team play direct roles in ensuring a safe and healthy workplace. They will regularly review this and all other measures taken to protect Purolator employees from COVID-19.

6.2 Human Resources

6.2.1 To ensure the implementation and execution of the Policy by communicating its purpose and processes with all stakeholders.

6.2.2 To ensure confidentiality of all information collected.

6.2.3 To identify non-vaccinated employees and provide reference materials to such employees, relating to the importance of full vaccination as well as a guide to local vaccination clinics. HR will also facilitate regular rapid testing, on a case-by-case basis.

6.3 Management

6.3.1 To communicate and enforce compliance with the Policy, in partnership with local and Divisional Human Resources.

6.4 Employees

6.4.1 To continue to comply with applicable health and safety measures to reduce the hazard of COVID-19 in the workplace, including but not limited to compliance with established workplace access controls (i.e., screening), wearing a medical-grade face mask as provided by Purolator, using provided PPE, maintaining appropriate physical distancing and self-monitoring of potential COVID-19 symptoms when at work.

6.4.2 If remaining unvaccinated for any reason, including due to an approved accommodation request under Purolator's Workplace Accommodation Policy or any other forms of accommodation, to comply with additional infection and prevention control measures, including providing proof of a negative COVID-19 test in compliance with this policy's procedures as required, as well as self-isolate if exposed to COVID-19. If remaining unvaccinated when accommodation is not approved, or when testing period has ended, employees may be subject to being placed on an unpaid leave of absence until vaccinations are completed.

7. Process

7.1 Collection

- 7.1.1 By September 20, 2021, all employees must log into the website provided by the Company and complete the questionnaire relating to their vaccination status at that time. (See Vaccination Status Attestation Process).
- 7.1.2 Results will be collected, with access limited to one (1) administrator and Human Resources Managers. HR Managers may share this information with other Human Resources professionals as required to enforce the policy.

7.2 Use

- 7.2.1 Employees will have an option to provide an email address at the time that they complete the questionnaire, in order to receive a copy of their data.
- 7.2.2 If an employee positively attests to their being fully vaccinated, their data will be stored and accessed for either or both of the following purposes:
 - a. A random audit conducted by National Human Resources
 - b. To comply with new, future vaccination requirements recommended by Public Health (i.e., boosters)

7.3 Disclosure

- 7.3.1 Purolator will not provide any information collected under this Policy to a third party, except where required by law. This could include disclosure of data to Public Health Authorities at their request, when in compliance with legal requirements.
- 7.3.2 Employees requesting an accommodation will have their information protected as per the Workplace Accommodation Policy.

7.4 Protection

- 7.4.1 A complete Privacy Impact Assessment was completed on both this Policy and the tool used to collect and store employees' information. Access to the information has been limited to those who must administer the Policy and will not be disclosed to any other person.

7.5 Retention and Destruction

- 7.5.1 The information will be retained for as long as required to administer the Policy. The Policy will be in place for as long as Public Health recommendations identify COVID-19 as a risk to employees and the general public.

7.5.2 The Policy will be reviewed at least once a quarter, and as required with changing Public Health recommendations.

7.5.3 When the data is no longer required, it will be deleted and no information collected under this Policy will be retained.

8. Exemptions

Employees who are not able to obtain a COVID-19 vaccine for reasons of disability, religion or other ground recognized under the *Canadian Human Rights Act* (the "Act") can submit a request for accommodation as per Purolator's Workplace Accommodation Policy.

All accommodation requests require documentary support identifying the need for accommodation and must be submitted along with the Accommodation Request Form.

Other forms of accommodations will be considered on a case-by-case basis.

9. Non-Compliance

Notwithstanding the short transition period preceding the enforcement of the Policy, any employee found to be in non-compliance with this Policy will be placed on an unpaid leave of absence until vaccination is complete, or until an accommodation request is approved.

For an initial transition period, employees who do not attest to a positive vaccination status will be required to adhere to the risk mitigating actions provided to them by the Human Resources Department. This is likely to include, but may not be limited to, submitting to, and providing negative test results from a rapid test, at a frequency required by the Company. It is expected that employees complete the testing on personal time and will not be compensated by the company for the time required for in-person, mandatory testing. The Company will make testing available at work sites where possible.

The initial transition period of mandatory testing is for a short transition period and will be reviewed regularly based on the guidance and advice of medical experts. Upon conclusion of the transition period, and as described above, any employees who are not in compliance with this policy will be then placed on an unpaid leave of absence.

An employee may provide confirmation of full vaccination at any time to become compliant with the Policy.

10. Confidentiality

The information collection pursuant to this policy is considered sensitive and confidential. Employees with access to this information are strictly prohibited from disclosing this data unless required during the course of their duties. Please refer to the *Employee Privacy Policy*.

11. Reference Documents

Related Policies, Procedures and Guidelines	Last Modified
Vaccination Status Attestation Process	
COVID Test Results - Collection	
Workplace Accommodation Policy	
Recruitment and Selection Policy	