



**Human Resources**  
**Revised Vaccination, Testing and Face Covering Policy**  
**During COVID-19 Pandemic – United States**

**Approved by:** VP Human Resources  
**Effective Date:** March 1, 2022  
**Revision Date:** February 28, 2022  
**Version:** Revision 6  
**Applies To:** U.S. Employees

**Purpose:**

Since the start of the pandemic, Driscoll's has followed guidance from federal, state and local agencies in implementing safety measures to reduce the risk of COVID-19 in the workplace and keep employees safe. The purpose of this policy document is to provide a consistent set of guidelines related vaccination, testing and face covering use for U.S. employees. This company policy is subject to changes with the introduction of additional governmental or agency guidelines.

**Scope: Who Should Follow this Policy?**

This policy on vaccination, testing, and face covering use applies to all Driscoll's U.S. employees, except where local or state law may differ.

**Vaccination Status Confirmation and Acceptable Forms of Proof of Vaccination:**

All employees are required to report their vaccination status and, if vaccinated, provide proof of vaccination no later than **March 1, 2022**. Confirmation of vaccination will be completed via a vaccination survey through Workday. Employees must provide truthful and accurate information about their COVID-19 vaccination status. Whoever knowingly and willfully makes any false statement, representation, certification or submits falsified documents regarding their vaccination status is also subject to fines and criminal penalties ("**Penalties for False Statements & Records**").

**Definitions**

- **Fully vaccinated.** Employees are considered fully vaccinated two weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses. For example, this includes two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, two weeks after a single-dose vaccine, such as Johnson & Johnson's vaccine, or two weeks after the second dose of any combination of two doses of different COVID-19 vaccines as part of one primary vaccination series.
- **Partially vaccinated.** An employee will be considered partially vaccinated if they have received only one dose of a two-dose vaccine.
- **Unvaccinated.** An employee is considered unvaccinated if they haven't received any vaccination.

**Vaccinated Employees**

Proof of vaccination status can be submitted by uploading a copy of the vaccination document to Workday. For employees without the ability to upload their vaccination status directly to Workday or needing assistance, arrangements must be made with AskHR. Vaccination documents will be treated in accordance with applicable laws and policies on confidentiality and privacy and securely archived in Workday.

Acceptable proof of vaccination status documents includes:

1. A copy of the COVID-19 Vaccination Record Card;
2. The record of immunization from a health care provider or pharmacy;
3. A copy of medical records documenting the vaccination;
4. A copy of immunization records from a public health, state, or tribal immunization information system; or
5. A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine(s).

**Unvaccinated Employees**

Unvaccinated employees are required to complete a vaccination status survey confirming their unvaccinated status. The survey is administered via Workday or facilitated by AskHR.

### **New Hires**

All new employees are required to comply with the vaccination, testing, and face covering recommendations outlined in this policy. Potential candidates for employment will be notified of the policy prior to the start of employment by a Recruiter.

To confirm vaccination status, new hires that are partially or fully vaccinated must provide and upload a copy of their vaccination document(s) to Workday prior to their start date and reporting to work.

For unvaccinated new hires, they must complete the vaccination status survey prior to their start date and reporting to work.

For Seasonal Employees, this will be facilitated through the onboarding process with AskHR.

### **Support for COVID-19 Vaccination:**

Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation. Studies show that COVID-19 vaccines are effective, especially at keeping adults and children from getting seriously ill even if they do get COVID-19. COVID-19 vaccines are safe and effective and millions of people in the United States have received COVID-19 vaccines. Also, people who are fully vaccinated can resume activities that they did before the pandemic. Driscoll's strongly encourages all employees to receive a COVID-19 vaccination and COVID-19 "booster shot" to protect themselves and other employees and do their part to keep their family and our communities safe.

Any Driscoll's employee not currently vaccinated, and that chooses to be vaccinated against COVID-19, should notify AskHR. AskHR will then provide the employee with information from the Centers for Disease Control and Prevention (CDC) and their State's Department of Public Health on how to obtain a COVID-19 vaccine. Employees can also schedule vaccination appointments directly through their own medical provider, local pharmacy, or mass vaccination clinic.

An employee wanting to get vaccinated, or receive a "booster shot", will be granted the day off and receive a full day's pay, per dose, to travel to the vaccination site to receive a vaccination. Additionally, employees will be granted up to two (2) workdays, with pay, immediately following each dose if they have side effects from the COVID-19 vaccination that prevents them from working.

Newly vaccinated employees will then be required to upload a copy of their vaccination document(s) to Workday after each dose until fully vaccinated.

The following procedures apply for requesting time off to get vaccinated, receive a "booster shot", and to recover from side effects from the vaccine:

- Regular fulltime employees: contact AskHR and submit time off request via Workday
- Seasonal employees: notify immediate manager and contact AskHR for assistance

Note: When eligible, and the employee receives a "booster shot", they must also upload to Workday a copy of their vaccination document reflecting date of the "booster shot".

### **COVID-19 Testing for Employees:**

Driscoll's strongly encourages all employees, regardless of their vaccination status, to voluntarily participate in periodic COVID-19 testing to help prevent and further reduce the likelihood of transmission in the workplace. Screening tests are intended to identify suspected or unknown cases of COVID-19 so that measures can be taken to prevent further transmission. Voluntary testing will be made available periodically by a third-party testing company at most job locations at no cost to employees.

Note: There may be times where testing is required based on statutory provisions. For example, in situations where someone has been identified as a close contact with a person who has been infected.

Driscoll's testing partner will share an employee's COVID-19 test results with Driscoll's and with the employee tested. Testing results will otherwise be held confidential by Driscoll's testing partner except as required to be disclosed by law (e.g., with the applicable public health authority). Information about an employee who tests positive for COVID-19 may otherwise only be disclosed to others where necessary in accordance with applicable law. Employee test results will not be kept separate from the employee's personnel file.

Non-Exempt employees will be compensated for time spent waiting for the administration of a test as well as the time to test. Testing dates and times will be coordinated, when possible, with work shifts.

Employees who have received a positive COVID-19 test or have been diagnosed with COVID-19 by a licensed healthcare provider, are not required to undergo COVID-19 testing for 90 days following the date of their positive test or diagnosis.

### **Face Coverings/Masks:**

Face coverings are not required in the workplace unless local or state jurisdiction indicate otherwise. Driscoll's strongly recommends that all employees, regardless of their vaccination status, wear a face covering while indoors or in a vehicle.

Employees that freely choose to wear a face covering at work should ensure that the face covering is comfortable and completely covers the nose and mouth.

Employees may be legally entitled to a reasonable accommodation if they cannot wear a face covering because of a disability, and/or wearing a face covering conflict with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated by the employee directly with AskHR. All such requests will be handled in accordance with applicable laws and regulations and Driscoll's General Employment Guidelines, Disability Accommodation and Religious Accommodation, found in the Employee Handbook.

### **Confidentiality and Privacy:**

All medical information collected from employees, including vaccination information, test results, and any other information obtained as a result of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.

### **Contingent Workers (Staffing Agency Workers):**

All contingent workers (staffing agency workers) based in the United States who perform services at or regularly visit Driscoll's locations to meet in person with employees are subject to this policy and must confirm their vaccination status and, if vaccinated, provide proof of vaccination with their respective staffing agency.

Staffing agencies are responsible for documenting and verifying that their employees (e.g., employees, consultants, subcontractors) are in compliance with this policy.

### **Employee Notification of Positive COVID-19 Result Requirement and Removal from the Workplace:**

Driscoll's requires all employees to promptly notify their manager when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider.

#### Medical Removal from the Workplace

Driscoll's has implemented a policy/practice for keeping COVID-19 positive employees from the workplace in certain circumstances. Driscoll's will immediately remove an employee from the workplace if they have received a positive COVID-19 test or have been diagnosed with COVID-19 by a licensed healthcare provider (i.e., immediately send them home or to seek medical care, as appropriate).

Depending on the circumstance, employees may be entitled to use Driscoll's COVID-19 sick pay for the time away from work. Employees should contact AskHR for more information regarding Driscoll's COVID-19 sick pay.

### Return to Work Criteria

For any employee removed because they are COVID-19 positive, Driscoll's will keep them removed from the workplace until the employee receives a negative test result; meets the return to work criteria in CDC's "Isolation Guidance"; or receives a recommendation to return to work from a licensed healthcare provider.

*If an employee has severe COVID-19 or an immune disease, Driscoll's will follow the guidance of a licensed healthcare provider regarding return to work.*

### **Duration:**

This policy will be in effect until further notice.

### **Questions:**

This policy will be maintained and administered through Human Resources, Director of People Policy & Safety Standards. Questions related to this policy may be directed either to AskHR, the COVID-19 Coordinator or the Director of People Policy & Safety Standards.