

Pandemic Vaccination Policy

1. Purpose

The health and safety of Gaining Resources Our Way ("G.R.O.W.") participants, employees, contractors, volunteers, and practicum students is a priority. G.R.O.W. is committed to taking every reasonable precaution to protect the health and safety of workers from the hazard of a pandemic. Vaccination is a key element in the protection of G.R.O.W.'s workers against the hazard of a pandemic.

G.R.O.W. is also committed to compliance with all applicable public and occupational health and safety, human rights, privacy and other laws in the development and implementation of this Policy.

2. Scope and Applicability

This Pandemic Vaccination Policy (the "Policy") applies to all G.R.O.W. employees (full-time, part-time, and casual), volunteers, contractors, third party contractors and practicum students at all premises where G.R.O.W. operates (collectively, "Workers").

This Policy will remain in effect until such time as G.R.O.W. determines, based on public health recommendations and best practices, it is no longer required as part of G.R.O.W.'s efforts to ensure a safe and healthy workplace. Similarly, G.R.O.W. may amend this Policy, including its scope, at any time it determines necessary to do so.

3. Policy

All new and existing G.R.O.W. workers are required to be **fully vaccinated** according to Manitoba Public Health regulations against pandemic related hazards and provide satisfactory proof to G.R.O.W., unless a worker has received a medical exemption, and an accommodation has been granted by G.R.O.W. in writing.

4. Proof of Vaccination

Workers are required to provide proof that they are fully vaccinated, satisfactory to G.R.O.W., such as the digital or physical immunization card or a provincial immunization record from Manitoba Public Health or Manitoba Shared Health that shows immunization dates (or a similar record from an equivalent body in another jurisdiction). Proof of being fully vaccinated will be provided to the G.R.O.W.

Executive Director upon request. No copy of a worker's immunization card/record will be kept.

Workers who refuse or otherwise do not provide proof of being fully vaccinated will be considered unvaccinated for the purposes of this Policy.

5. Privacy

All information provided by workers to G.R.O.W. as required under this Policy will be kept in a confidential manner and will only be used or disclosed for the purposes outlined in this Policy and retained for only so long as is necessary. A worker's vaccination status will be shared with as few persons at G.R.O.W. as possible to implement this Policy.

6. Reasonable Accommodation

Where a worker establishes to the satisfaction of G.R.O.W. that they are precluded from receiving a pandemic vaccination on grounds protected by human rights legislation, G.R.O.W. will work to accommodate the worker up to the point of undue hardship. Accommodations will be considered by G.R.O.W. on a case-by-case basis.

To discuss possible exemptions and related accommodation under this Policy, workers should contact the G.R.O.W. Executive Director as soon as possible.

Personal objections to the pandemic vaccine are not a basis for exemption from this Policy and the requirement of full vaccination.

7. Continued Compliance with all Health and Safety Precautions

All workers must continue to follow all pandemic protocols implemented by G.R.O.W. including those safety measures relating to physical distancing, mask wearing and sanitizing.

No worker is to attend any premises occupied by G.R.O.W. if they have any symptom related to a pandemic hazard, whether or not they are vaccinated.

8. Ongoing Monitoring and Assessment of Pandemic Workplace Safety Measures

G.R.O.W. will continue to closely monitor its pandemic risk mitigation strategy and the evolving public health information and context, to ensure that it continues to protect the health and safety of workers and the public at large. To that end, G.R.O.W. may amend this Policy, including the scope of this Policy, at any time it determines necessary to do so.

9. Consequences of Non-Compliance with Policy

Workers who do not comply with this Policy, or who provide false information regarding their vaccination status, may be subject to corrective measures. For employees, such corrective measures will include disciplinary action up to and including termination of employment.

10. Review

This policy and its related procedures will be reviewed by the Governance Committee and approval by the Board every three (3) year or as required.

Date Approved May 14, 2025 Approved by Board of Directors

Next Date for Review May 2028 To be Reviewed by Governance Cttee