

ARTS CLUB THEATRE COMPANY

COVID-19 VACCINATION POLICY

PURPOSE

The COVID-19 pandemic has given rise to significant health and safety risks across many different types of workplaces. Throughout the pandemic, the Arts Club Theatre Company (the “**Company**”) has adapted and evolved its business operations in order to comply with applicable laws and to provide a safe environment for workers (including employees, contractors and volunteers), as well as our guests.

The emergence of more highly transmissible variants and the significantly elevated risk of transmission in indoor environments has led us to carefully consider the medical and scientific evidence in addition to direction from government and public health authorities going forward.

We now know that vaccination plays a critical role in mitigating the transmission of COVID-19. Consistent with this demonstrated effectiveness, the government of British Columbia imposed a provincial health order which recently took effect which requires guests to provide proof of vaccination to access a range of social and recreational events, including access to performances occurring on Company premises.

In our day-to-day operations, we have a responsibility to take every reasonable precaution for the protection of the health and safety of all who enter Company premises or locations considered workplaces of the Company. Due to the nature and risks of COVID-19, the nature of the work we do in theatre and the health and economic impacts of COVID-19 outbreaks and shutdowns, we have determined we need to set clear guidelines and expectations with regard to those working in our workspaces.

In addition to the considerations set out above with respect to the scientific evidence and direction from government officials, the Company has also carefully considered its obligations pursuant to applicable occupational health and safety, human rights, and privacy law in implementing this COVID-19 Vaccination Policy (the “**Policy**”).

The purpose of this Policy is to provide guidelines pertaining to the expectations and requirements of workers, volunteers, suppliers and contractors, including performance cast and crew members, with respect to COVID-19 and vaccination.

The provisions of this Policy will comply with all applicable laws. This Policy complements and is not intended to replace nor contradict any provincial health orders or public health guidance which set out additional health and safety measures and procedures. For greater certainty, in the event that more stringent vaccination and exemption requirements are prescribed by law, such more stringent requirements will prevail over this Policy.

SCOPE

This Policy applies to all employees, volunteers, suppliers and contractors of the Company, including performance cast and crew members (collectively, “**Workers**”).

The Company will inform any applicable external parties (i.e. suppliers) regarding any requirements for proof of vaccination, as well as the administrative process for the subsequent external parties prior to entering the Company's premises.

VACCINATION REQUIREMENT

In accordance with the Company's duty to provide and maintain a workplace that is free of known hazards, all Workers are required to be Fully Vaccinated against COVID-19.

Effective October 15 2021, all workers must be vaccinated with at least one dose by October 25, 2021. From Monday November 8, all workers will be required to be fully vaccinated against COVID-19. For the purposes of this Policy, "**Fully Vaccinated**" means at least 7 days past a second dose of a COVID-19 vaccine approved by Health Canada. We will update this definition according to provincial and federal guidelines, including in the event that public health recommends further vaccine doses.

For prospective employees, contractors and volunteers who are not hired or engaged by the Company as of the date this Policy went into effect, such employees, contractors and volunteers must show proof of vaccination as a condition of being hired or engaged, subject to the accommodation provisions set out below.

ACCOMMODATION UNDER THE BRITISH COLUMBIA HUMAN RIGHTS CODE

Workers who cannot be vaccinated against COVID-19 due to medical, religious, or other reasons protected by the British Columbia *Human Rights Code* will be accommodated to the point of undue hardship. Such accommodations may take the form of additional restrictions, such as the continued (or increased) use of personal protective equipment, routine COVID-19 testing, limiting access to the workplace or to vulnerable co-workers or members of the public, or changes in work duties or assignments. Any such accommodative measures will be based on medical, scientific, workplace safety and public health guidance. Please note that accommodating unvaccinated Workers may not be possible in every case or may involve changes in work assignments.

Any information provided to the Company for purposes of proving vaccination, or seeking accommodation related to not receiving vaccinations, will be treated confidentially and shared only with those persons within the Company who require it for relevant employment purposes including but not limited to for seeking and arranging suitable accommodation where possible.

Personal and/or philosophical objections to vaccinations are not considered sufficient justification for granting an accommodation and only protected grounds set out in the British Columbia *Human Rights Code* will be considered for reasonable accommodation from this Policy.

All questions and requests for accommodations should be directed to the Executive Director, Peter Cathie White, at pcathiewhite@artsclub.com or 604.687.5315 ext. 255.

DISCLOSING VACCINATION STATUS

All Workers are required to disclose to the Company proof of at least one dose vaccination by October 25, 2021. All Workers are required to disclose to the Company proof of full two-dose vaccination by November 8, 2021.

The Company will collect, use and disclose personal information, including proof of vaccination, in accordance with our privacy policy and any applicable privacy legislation including the British Columbia *Personal Information Protection Act*.

As a result, the Company will collect the minimum amount of personal information required to address workplace health and safety issues raised by COVID-19 as follows:

- Workers will show their direct supervisor proof of vaccination by disclosing their digital British Columbia Vaccine Card. Workers can obtain their digital vaccination card here: <https://www2.gov.bc.ca/gov/content/covid-19/vaccine/proof> by inputting their personal health number, date of birth and date of vaccination to access their card.
- This will be a visual confirmation only. Copies of vaccination status or vaccine cards will not be collected or stored anywhere.
- For rehearsals and in-theatre workers, your contact for showing proof of vaccination will be given to you before your expected work begins.
- Visual confirmation of the vaccination status of Workers will be recorded by your direct supervisor and kept in a confidential file that will only be accessible to the Executive Business Manager and, when the position begins on Nov 8, will then be transferred to the Human Resources Manager. The Executive and Artistic Directors will only access only on a need-to-know basis. It will be a simple check “yes” indicating that the Worker has demonstrated proof of vaccination.
- This record will be kept securely electronically and this information will be shared externally only where authorized or required under applicable laws, such as where it is required by public health officials or other government agencies. This record will be destroyed as soon as possible if there is no business, legal or operational need to retain them.

Vaccination status information will be used for the purposes outlined in this Policy (i.e. for health and safety reasons), in addition to more specifically guiding the Company’s decisions about infection prevention and control measures, assisting with outbreak protocol, facilitating case and contact management and managing employment and other contractual relationships.

If you fail to disclose your vaccination status in accordance with this Policy by November 8, 2021 you will be deemed by the Company to be unvaccinated.

If further doses of the COVID-19 vaccine are recommended by government health officials, Workers may be required to provide documentation of their receipt of these additional doses.

FAILURE TO BE FULLY VACCINATED

Employees who are not Fully Vaccinated or who are deemed to be unvaccinated by failing to disclose their COVID-19 vaccination status as set out above and who do not have a valid accommodation exemption as set out in this Policy for reasons protected by the British Columbia *Human Rights Code*, will be put on unpaid administrative leave effective November 8 for a period of 30 days. Such employees will then have 30 days to provide proof of vaccination prior to the return to work.

In the event any such employee fails to do so their employment or contract may be terminated or the unpaid administrative leave extended upon the expiry of the 30-day period.

For contract workers, such as artists/designers/running crew, the termination clause of contracts may be enacted if not fully vaccinated by November 8, 2021.

The Company will assess non-compliant volunteers, suppliers and contractors and reserves the right to terminate their contracts, in accordance with the applicable contractual terms.

As noted above, Workers may be granted an exemption from the Policy if they have not been vaccinated because of medical, religious or other grounds protected under the British Columbia *Human Rights Code*.

OTHER PROTOCOLS STILL IN EFFECT

We will continue to take proactive steps to mitigate the risks of COVID-19 in the workplace.

This Policy supplements, and does not replace, the public health measures set out in British Columbia Provincial Health Officer orders, public health guidance, the British Columbia Center for Disease Control Public Health Communicable Disease guidance and the Company's latest COVID Safety Procedures Sheets and Communicable Disease Prevention Plan.

VIOLATIONS OF THIS POLICY

It is a violation of this Policy:

- to access Company premises or conduct Company business at any non-Company premises without fully complying with this Policy;
- to provide any false, misleading, or otherwise dishonest information or documents to the Company in relation to this Policy;
- to otherwise fail to comply with any COVID-19 health or safety precaution requirement put in place by the Company, whether or not such requirement is expressly set out in this Policy; or
- to access, use, or disclose personal information other than in accordance with this Policy and the British Columbia *Personal Information Protection Act*.

CHANGES TO THIS POLICY

It is expected that the level of workplace risk posed by COVID-19 may change as new outbreaks, developments and scientific discoveries unfold. Accordingly, changes to this Policy may be introduced from time to time to respond to these developments in alignment with the protocols established by government officials as well as industry best practices.

QUESTIONS OR CONCERNS

If you have any questions or concerns about this Policy generally, or related privacy practices, or the Company's management of personal information collected under this Policy, please contact the Company's privacy officer Teddy Forsyth at tforsyth@artsclub.com or 604.6875315 ext. 249.

October 14, 2021