



MANDATORY COVID-19 VACCINATION POLICY

PURPOSE

At Curling Canada, we are committed to providing and maintaining a safe and healthy environment for all. Consistent with this commitment, Curling Canada has established this Mandatory COVID-19 Vaccination Policy (the “**Policy**”). The Policy requires that, in accordance with the terms set forth below, all persons subject to this Policy (as defined in Scope, below) be fully vaccinated for COVID-19 or obtain an approved accommodation or exemption.

BACKGROUND

Curling Canada has legal obligations to take *every precaution reasonable in the circumstances* to protect the health and safety of a worker and its stakeholders. The objective underlying this Policy is to provide a healthy and safe environment for employees, contractors, coaches, athletes, support staff and customers, and safeguard the broader communities in which they live.

SCOPE

This Policy applies to all Curling Canada staff, contractors, directors, coaches, athletes, support staff, volunteers and customers (Collectively “Curling Canada Stakeholders”) above the age of 12. If the building policy for staff does not mandate full vaccination status as a condition of employment, a number of control measures will be in effect to reduce the risk of transmission.

TIMING

All Curling Canada Stakeholders must be fully vaccinated by **October 15, 2021**. “Fully vaccinated” includes both doses of a Health Canada approved vaccine, where applicable. It is the responsibility of the Curling Canada Stakeholder to ensure there is sufficient time to receive both doses of the vaccine by **October 15, 2021**. After **October 15, 2021**, subject to relevant accommodations or exemptions, all Curling Canada Stakeholders must be fully vaccinated. Curling Canada staff who fail to comply with the terms set out in this Policy may be subject to disciplinary action, up to and including termination from their employment.

PROOF OF VACCINATION

Once a Curling Canada Stakeholder has been fully vaccinated, they are required to provide proof of vaccination to Curling Canada. This must be provided prior to **October 15, 2021**, or for new staff members, prior to their first day of employment. Proof can be in the form of a copy of the proof of vaccination given at the time of receiving vaccination, or a letter from a medical practitioner, confirming the Curling Canada Stakeholder has been vaccinated. Curling Canada



will only collect, use and disclose information regarding a Curling Canada Stakeholder's vaccination status in accordance with its Privacy Policy and all applicable privacy laws.

EXEMPTIONS

Curling Canada recognizes its responsibilities and duties under provincial human rights legislation, such as the Ontario *Human Rights Code* (the "Code"). If a Curling Canada Stakeholder is unable to be vaccinated, due to a protected ground, as defined by the Code, Curling Canada has a duty to accommodate to a point of undue hardship.

However, this duty to accommodate must be balanced against Curling Canada's obligations to protect the health and safety of Curling Canada Stakeholders. Due to the serious health threat COVID-19 presents to the public, if a Curling Canada Stakeholder will not be vaccinated because of a protected ground under the Code, they must request an accommodation or exemption which falls under one of the following two categories:

- 1) Medical Condition, or;
- 2) Religious / Creed.

Medical Condition Exemption

A Curling Canada Stakeholder who is requesting an exemption from this Policy on the basis of a medical condition must provide Curling Canada with a letter from a medical doctor, clearly stating the reason why the staff member should be exempted from receiving the vaccine. This letter will be considered information in the consideration of the exemption and does not constitute, in and of itself, an exemption.

Religious/Creed Exemption

The Ontario Human Rights Tribunal defines religion as "the practices, beliefs and observances that are part of a faith or religion. It does **not** include personal moral, ethical or political views".

There is no requirement under the Code to accommodate a bald refusal to be vaccinated arising from a political belief and/or principle. Political belief, such as the objection to receiving the vaccination on a principled basis, is not a protected ground under the Code.

A Curling Canada Stakeholder may apply for an exemption, due to religious belief or creed. Curling Canada reserves the right to ask for materials in support of Curling Canada Stakeholder's religious belief or creed, including a letter of support from a religious leader or community. This letter will be considered information in the consideration of the exemption and does not constitute, in and of itself, an exemption.





Process to Receive an Accommodation

- 1) The Curling Canada Stakeholder who seeks an accommodation, including an exemption, is required to submit a COVID-19 Vaccination Accommodation/Exemption Request to covidquestions@curling.ca
- 2) The staff member must submit an Accommodation/Exemption Request to Curling Canada's **Executive Director, Corporate Services**, at covidquestions@curling.ca with supporting documentation.
- 3) The **Executive Director, Corporate Services** will consult with a committee of subject-matter experts as deemed necessary to determine whether the accommodation, including an exemption, will be granted based on the accommodation process set out below. If additional information is required from the Curling Canada Stakeholder, the **Executive Director, Corporate Services** will follow up.
- 4) The **Executive Director, Corporate Services** will confirm receipt of the Accommodation/Exemption Request. An original copy of the request email will be securely stored at Curling Canada.

The accommodation process is a shared responsibility. All parties should cooperatively engage in the process, share information and consider potential accommodation solutions. Curling Canada Stakeholders who are requesting an accommodation are required to:

- 1) Make the accommodation needs known to the best of their ability, preferably in writing, in a timely manner;
- 2) Answer reasonable questions or provide information about relevant restrictions or limitations, including information from health-care professionals;
- 3) Take part in discussions about possible accommodation solutions;
- 4) Cooperate with any experts whose assistance is required to manage the accommodation process;
- 5) Meet agreed-upon performance standards and requirements, once accommodation is provided; and
- 6) Work with Curling Canada administration on an ongoing basis to manage the accommodation process.



Vaccination Policy Curling Canada Events

Note, due to the ever-changing COVID-19 situation, restrictions may be added, modified, or lifted in the future. If COVID-19 cases increase, if the risk of COVID-19 in areas increases significantly, and/or if there are COVID-19 outbreaks, Curling Canada's Return to Play Medical Committee may have to add back, change or update health and safety protocols.

Curling Canada's policy:

- (a) **Only fully vaccinated** players and coaches may access the field of play. Masks **are not** required for practice or game play.
- (b) Broadcast crew, game umpires, ice technicians **must be fully vaccinated** to access the event building / arena / club. Each group will wear masks in the field of play.
- (c) Host committee volunteers **must be fully vaccinated** to access the event building / arena / club / patch. Volunteers will wear masks at all times (except while eating).
- (d) Fans **must be fully vaccinated** to access the building / arena / club / patch.
- (e) Building / arena / club / patch employees **should be fully vaccinated** to avoid / limit interactions with each of (a), (b), (c) and (d). If the building policy for staff does not mandate full vaccination status as a condition of employment, there are a variety of control measures to help reduce the risk of transmission. These measures help protect workers:
 - (1) rapid test screening to keep people who may be infectious out of the workplace;
 - (2) wearing masks can help reduce the amount of virus;
 - (3) maintaining physical distance;
 - (4) wearing personal protective equipment (PPE).
- (f) Curling Canada will be responsible for collecting and protecting proof of vaccination.
- (g) **COVID-19 Protocols – All Events:**
 - (1) Masks will be worn by any volunteer, umpire, association staff, and broadcast crew members in the field of play;
 - (2) Masks will be worn indoors at all times by players / coaches except within the field of play, the hotel room, or while eating or drinking;
 - (3) Prohibit any attendance of bars or nightclubs off-site from the areas controlled by the event. Restaurants are allowed only if seated with vaccinated known individuals. Outdoor dining is recommended where possible;



- (4) Strongly recommend **no** congregation in hotel rooms outside of your group; teams may congregate, umpires may congregate, etc.;
 - (5) Temperature testing may be in place to access backstage. A high temperature (greater 37.9° Celsius) will not allow access backstage until assessed by a medical doctor.
 - (6) Other COVID testing (PCR, rapid) may be in place at any time.
- (h) **Vaccination schedules:**
- (1) A minimum of 28 days between first and second dose (when two doses are required);
 - (2) The second dose received a minimum of 14 days prior to arrival in the host city.