



## PATRIOT ENTERPRISES LLC

### MANDATORY COVID-19 VACCINATION POLICY FOR CONTINENTAL UNITED STATES (CONUS) CONTRACT COVERED EMPLOYEES

*Effective October 27, 2021*

#### Introduction

In compliance with recent guidance issued for contractors who perform work for the federal government, Patriot Enterprises is implementing a mandatory vaccination policy for Continental United States (CONUS) to include Alaska and Hawaii contract covered employees, as defined below, subject to the exceptions in this policy explained below. To the extent an employee is working onsite on a contract at a federal installation or facility within the Continental United States (to include Hawaii and Alaska) or for a client who maintains a vaccination or COVID-19 health and safety policy, employees must also comply with the installation's or client's applicable policy or directive, even if that policy is stricter than this policy.

This policy is based on guidance from the Centers for Disease Control and Prevention (“CDC”) and the Equal Employment Opportunity Commission (“EEOC”), and is designed to comply with all applicable federal, state, and local laws. Please read this policy carefully. Rules and regulations associated with this policy continue to evolve, and Patriot Enterprises reserves the right to modify this policy at its discretion.

#### Information About COVID-19 Vaccines

The CDC has promoted the benefits and safety of approved COVID-19 vaccines. According to the CDC, COVID-19 vaccinations have been shown to be highly effective at preventing you from getting sick with COVID-19 and may prevent you from experiencing the most severe consequence of the disease and spreading the virus to others.

An individual is considered fully vaccinated two weeks after the second dose of a two-dose vaccine (i.e., Moderna or Pfizer) or two weeks after a single-dose vaccine (i.e., Johnson & Johnson).

More information about COVID-19 vaccines and the vaccine approval process is available and frequently updated on the CDC's website at: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/>.

#### Vaccination Requirements/Administration

- Employees working on or in connection with a covered federal contract and employees working in the same workplace as said employees (collectively, “covered employees”) must be vaccinated against COVID-19 as set forth in this policy unless an exemption from this policy has been granted as an accommodation. Patriot Enterprises will notify you if you are a covered employee.
- CONUS Contract Covered employees must be fully vaccinated against COVID-19 on or before December 8, 2021, or by the first day of performance on a covered contract, unless an exemption from this policy has been granted as an accommodation.
- CONUS Contract Covered employees must provide proof of their COVID-19 vaccination status to the Human Resources Department (Phone: 205-721-2885 or Email: [PatriotVaccineCard@Xcelhr.com](mailto:PatriotVaccineCard@Xcelhr.com)) or seek and receive a reasonable accommodation prior to December 8, 2021, or the first day of performance of a covered contract. Proof of vaccination status is limited to a copy of the record of



immunization from a health care provider or pharmacy, a copy of the CDC issued COVID-19 Vaccination Record Card, a copy of medical records documenting the vaccination, a copy of immunization records from a public health or State immunization information system, or a copy of any other official documentation verifying vaccination with information on the vaccine name, date(s) of administration, and the name of health care professional or clinic site administering vaccine. Please do not provide any additional medical or genetic information with your proof of vaccination status.

- Patriot Enterprises' CONUS Contract Covered employees working on DoD installations/facilities must adhere to DoD requirements for installation and building access as it relates to proof of COVID vaccination or testing requirements if they have an approved accommodation. If working on a DoD installation or facility it is the employee's responsibility to meet DoD requirements to access the worksite to maintain employment. Current DoD guidance is attached (Attachment 1) and will be updated and distributed as required. Furthermore, individual installations and facilities can create more stringent than those published at the DoD level and the employee will be required to meet those standards to maintain employment.
- Patriot Enterprises' CONUS Contract Covered employees who fail to comply with these requirements will be barred from performing work and may be subject to disciplinary measures, up to and including termination of employment, subject to reasonable accommodation and other requirements of applicable federal, state, and local law.
- Patriot Enterprises' CONUS Contract Covered employees are responsible for scheduling and obtaining all recommended doses of an FDA-approved COVID-19 vaccine. Employees may get the vaccine during regularly scheduled work hours with advanced written notice and approval from the program manager. New-hires must be fully vaccinated before their designated start-date unless an exemption from this policy has been granted as an accommodation.
- New-hires must submit proof of their COVID-19 vaccination status or seek and receive reasonable accommodations before their designated start-date. Proof of vaccination status is limited to a copy of the record of immunization from a health care provider or pharmacy, a copy of the CDC issued COVID-19 Vaccination Record Card, a copy of medical records documenting the vaccination, a copy of immunization records from a public health or State immunization information system, or a copy of any other official documentation verifying vaccination with information on the vaccine name, date(s) of administration, and the name of health care professional or clinic site administering vaccine. All proof of vaccinations and requests for accommodations must be sent via email to: [PatriotVaccineCard@Xcelhr.com](mailto:PatriotVaccineCard@Xcelhr.com). Please do not provide any medical or genetic information with your proof of vaccination status.
- PATRIOT ENTERPRISES, JOB OFFERS ARE CONTINGENT ON PROVIDING PROOF OF COVID-19 FULLY VACCINATED STATUS OR SEEKING AND RECEIVING A REASONABLE ACCOMMODATION AS SET FORTH BELOW.

### **Accommodation and Exemption Requests**

#### **Disability Accommodation**

Patriot Enterprises provides reasonable accommodations, absent undue hardship, to qualified individuals with disabilities that enable them to perform their job duties. Reasonable accommodation may include appropriate adjustment or modifications of employer policies, including this mandatory vaccination policy.



If you believe you need an accommodation regarding this policy because of a disability, you are responsible for requesting a reasonable accommodation (Attachment 2) from the Human Resources Department, using the enclosed form.

### **Religious Accommodation**

Patriot Enterprises provides reasonable accommodations, absent undue hardship, to employees with sincerely held religious beliefs, observances, or practices that conflict with getting vaccinated.

If you believe you need an accommodation regarding this policy because of your sincerely held religious belief, you are responsible for requesting a reasonable accommodation from the Human Resources Department, using the enclosed form (Attachment 3).

### **Interactive Process**

Patriot Enterprises will engage in an interactive dialogue with you to determine the precise limitations of your ability to comply with this mandatory vaccination policy and explore potential reasonable accommodations that could overcome those limitations. Patriot Enterprises encourages employees to suggest specific reasonable accommodations. However, Patriot Enterprises is not required to make the specific accommodation requested and may provide an alternative effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on Patriot Enterprises.

### **How to Request an Accommodation**

You may request a reasonable accommodation or other exemption from this policy by completing the Patriot Enterprise's relevant Request for Accommodation Form (Attachment 2 or 3) and returning it to the Human Resources Department (Phone: 205-721-2885 or Email: [PatriotVaccineCard@Xcelhr.com](mailto:PatriotVaccineCard@Xcelhr.com)).

Patriot Enterprises reserves the right to request additional documentation supporting the need for an accommodation or request for any other exemption. Patriot Enterprises will keep confidential any medical information obtained in connection with your request for a reasonable accommodation or other exemption.

### **Determinations**

Patriot Enterprises makes determinations about requested accommodations and exemptions on a case-by-case basis considering various factors and based on an individualized assessment in each situation. Patriot Enterprises strives to make these determinations expeditiously and in a fair and nondiscriminatory manner and will inform you after a determination is made. If you have any questions about an accommodation or exemption request you made, please contact the Human Resources Department. If a request for accommodation is denied, employees will be subject to termination. By submitting your accommodation request, you understand and agree to this policy.

### **Symptom Monitoring**

Patriot Enterprises will conduct periodic health checks, including whether or not employees have any symptoms consistent with COVID-19, have had close contact with anyone diagnosed with COVID-19, and/or have test positive for COVID-19.

### **Masking and Social Distancing Obligations**



Patriot Enterprises complies with the CDC's published guidance for masking and physical distancing. Employees may be obligated to wear a CDC approved mask indoors and in certain outdoor settings. Masks are to be worn correctly (over mouth and nose). To the extent practicable, unvaccinated individuals should maintain a distance of at least 6 feet from others at all times. Patriot Enterprises checks the CDC COVID-19 Data Tracker County View website for community transmission information on a weekly basis to determine proper workplace safety protocols.

### **Confidentiality and Privacy**

Patriot Enterprises will treat all medical information collected from individuals, including vaccination information and any other information obtained as a result of testing and symptom monitoring, in accordance with applicable laws and policies on confidentiality and privacy. Such information will be accessible only to those with a need to know. If the client requests the information as a requirement for accessing the client site, this will be considered as a need-to-know requirement. By submitting your vaccination record or accommodation request, you understand and agree to this policy.

### **Policy Administration and Questions**

Our Human Resources Department is responsible for administering and enforcing this policy. If you have any questions about this policy or about health and safety issues that are not addressed in this policy, please contact the Human Resources Department (Phone: 205-721-2885 or Email: [PatriotVaccineCard@Xcelhr.com](mailto:PatriotVaccineCard@Xcelhr.com) ).

### **Enforcement and Non-Retaliation**

Failure to comply with or enforce this policy may result in revocation of offers for new-hires, and discipline for current employees, up to and including termination of employment.

Patriot Enterprises prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of this policy or any other health and safety concern. Employees also have the right to report work-related injuries and illnesses, and the Patriot Enterprises will not discharge or discriminate or otherwise retaliate against employees for reporting work-related injuries or illnesses or good faith health and safety concerns.