

COVID-19 Vaccination Policy



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Document Revision

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Document Distribution

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1 PURPOSE

- (a) COVID-19 is a condition caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). COVID-19 is highly contagious and potentially fatal.
- (b) SARS-CoV-2 can be transmitted through respiratory droplets, smaller particles (aerosols), direct physical contact with an infected individual, and indirectly through contaminated objects and surfaces. Those who have been in close contact with a person infected with COVID-19 are at highest risk of becoming infected.
- (c) A number of cases of individuals with COVID-19 have been confirmed in Australian jurisdictions, including by means of community transmission, and there is an ongoing risk of continuing introduction or transmission of COVID-19.
- (d) A number of COVID-19 vaccines have been developed and made available throughout the world.
- (e) The purpose of this policy is to:
 - (i) clarify the requirements for vaccination against COVID-19 so as to minimise exposure to and transmission of the virus at Legrand's premises; and
 - (ii) enable Legrand to meet its legislative obligations including in relation to work health safety and public health.

2 SCOPE

- (a) This policy applies to all workers and visitors of Legrand.
- (b) For the purposes of this policy:
 - (i) **ATAGI** means the Australian Technical Advisory Group on Immunisation;
 - (ii) **medical contraindication certificate** means a certificate issued by an Australian registered medical practitioner certifying that, because of a specified medical contradiction, the person is unable to be administered a COVID-19 vaccine;
 - (iii) **worker** means any employee (whether full time, part time, casual, maximum term etc) of Legrand as well as Legrand's directors, volunteers and agents;
 - (iv) **visitor** means any person (other than a worker) who intends to enter Legrand's premises, including customers, independent contractors and clients of Legrand;
 - (v) **up-to-date vaccination status** has the meaning prescribed by ATAGI in their clinical guidance for the use of COVID-19 vaccines (including any additional/booster doses as determined by ATAGI from time to time); and

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- (vi) a person has been **tested for COVID-19** if a test for COVID-19 has been administered using a polymerase chain reaction (PCR) test or a rapid antigen test in the way approved by the Chief Health Officer in the particular State or Territory;
- (c) This policy will be made available to all Legrand's workers via Skytrust, and on our company website.
- (d) This policy does not impose any legally binding obligations on Legrand.

3 VACCINATION AGAINST COVID-19 GENERALLY

- (a) Vaccination is a core element of the Australian Government's response to the COVID-19 pandemic.
- (b) Legrand believes that vaccination against COVID-19 is the best way to protect against severe illness and death from COVID-19. Legrand also believes that vaccination can prevent or minimise the risk of continuing introduction or transmission of COVID-19 at its premises.
- (c) Legrand encourages as many people as possible to become vaccinated against COVID-19 and otherwise maintain an up-to-date vaccination status. However, vaccination against COVID-19 is not without risk.
- (d) Legrand encourages all workers and visitors to speak with their medical practitioner and consider vaccination against COVID-19 based on medical advice.

4 MANDATORY VACCINATION AGAINST COVID-19

4.1 Mandatory vaccination against COVID-19 under applicable law

- (a) Legrand's workers and visitors may be required under applicable law (e.g. Public Health Orders) to have an up-to-date vaccination status or otherwise be vaccinated against COVID-19 in order to perform their usual duties and responsibilities and/or as a condition of entering Legrand's premises (including Legrand's factories and other workplaces).
- (b) It is Legrand's policy to comply with all laws requiring its workers and visitors to have an up-to-date vaccination status or otherwise be vaccinated against COVID-19. For further information, please refer to:
 - (i) Victoria - <https://www.dhhs.vic.gov.au/victorias-restriction-levels-covid-19>
 - (ii) New South Wales - <https://www.health.nsw.gov.au/Infectious/covid-19/Pages/public-health-orders.aspx>
 - (iii) Australian Capital Territory - <https://www.covid19.act.gov.au/act-status-and-response/act-public-health-directions>
 - (iv) Queensland - <https://www.health.qld.gov.au/system-governance/legislation/cho-public-health-directions-under-expanded-public-health-act-powers>

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- (v) Western Australia - <https://www.wa.gov.au/government/document-collections/covid-19-coronavirus-western-australia-declaration-of-state-of-emergency-and-public-health-emergency-declarations>
- (vi) South Australia - <https://www.covid-19.sa.gov.au/emergency-declarations>
- (vii) Tasmania - <https://www.coronavirus.tas.gov.au/resources#Current-Directions>
- (viii) Northern Territory - <https://coronavirus.nt.gov.au/chief-health-officer-directions>

4.2 Mandatory vaccination against COVID-19 for other workers

- (a) Legrand may, from time to time, require its workers to have an up-to-date vaccination status (even if such persons are not required to have an up-to-date vaccination status under applicable law) as condition of their employment or engagement.
- (b) **Schedule 1 to this policy** details the groups of workers that Legrand currently requires to have an up-to-date vaccination status.
- (c) All workers must familiarise themselves with Schedule 1 and ensure that they have an up-to-date vaccination status, if required.
- (d) Legrand may review and update Schedule 1 from time to time, in which case it will take reasonable steps to communicate such changes to any affected workers and provide notice (to the extent reasonably practical) before such changes take effect.

4.3 Vaccination against COVID-19 for other visitors

All visitors to Legrand's premises (including its factories and other workplaces) may be asked to provide up-to-date vaccination status (even if such persons are not required to have an up-to-date vaccination status under applicable law) as a condition of entering and/or remaining at the premises.

5 TESTING FOR COVID-19

Nothing in this policy shall limit or restrict Legrand from requiring its workers and visitors to be tested for COVID-19 as a pre-condition to entering its premises including in circumstances where Legrand Australia reasonably believes the worker or visitor:

- (a) has become infected with COVID-19; or
- (b) was exposed to a person who was, or was likely, infected with COVID-19 (e.g. where the worker or visitor was exposed to a person who was a close contact of a person who had become infected with COVID-19).

6 EXEMPTIONS

- (a) Depending on the particular circumstances, it may not be reasonable for certain workers or visitors to have an up-to-date vaccination status. Subject to the relevant laws as at the

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time, a person will not be required to have an up-to-date vaccination status if or more of the following applies:

- (i) the person is unable, due to a medical contraindication, to be administered a COVID-19 vaccine;
 - (ii) the person is unable to reasonably access a COVID-19 vaccine, including where the supply of the relevant vaccine is unavailable in accordance with Government guidelines and age recommendations or where the person is observing the relevant waiting period between COVID-19 vaccines; or
 - (iii) an exemption applies under a relevant law in relation to the person.
- (b) If a person seeks an exemption to a requirement to have an up-to-date vaccination status under this policy, they must notify Legrand as soon as practicable and give Legrand evidence that would satisfy a reasonable person of the reason(s) for the exemption request.
 - (c) In the case of an exemption based on a medical contraindication to the COVID-19 vaccine, the exemption request must be supported by a medical contraindication certificate or such other evidence that would satisfy a reasonable person of the reason(s) for the exemption request.
 - (d) Legrand will consider any request for an exemption on a case-by-case basis in accordance with its obligations under applicable laws (including applicable anti-discrimination legislation).
 - (e) If Legrand considers that it is not reasonable for a particular worker or visitor to have an up-to-date vaccination status, Legrand may (without limitation):
 - (i) require the person to undergo testing for COVID-19 in accordance with section 5 of this policy;
 - (ii) implement alternative arrangements (e.g. alternative duties); or
 - (iii) grant either a temporary or permanent exemption (provided that any such exemption will be granted in Legrand's absolute discretion and only to the extent permitted by law).

7 NOTIFICATION AND EVIDENCE

- (a) If a worker or visitor is required under applicable law (e.g. Public Health Orders) to have an up-to-date vaccination status or otherwise be vaccinated against COVID-19, they must provide Legrand with such evidence as specified in the particular law (eg Australian Immunisation Register).
- (b) If a worker or visitor is otherwise required by Legrand under this policy to have an up-to-date vaccination status, they must provide Legrand evidence that would satisfy a reasonable person that they have an up-to-date vaccination status. This may include (without limitation):

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- (i) digital vaccine certificate (e.g. via myGov or Medicare);
- (ii) evidence from the Australian Immunisation Register; or
- (iii) any other evidence specified in an applicable law.

8 PRIVACY

- (a) The collection, use and disclosure of personal and health information under this policy will be in accordance with Legrand's Privacy Policy and its obligations under applicable laws (including privacy and health laws).
- (b) Legrand will take steps to ensure that information obtained in accordance with this policy is treated confidentially, as far as it is reasonably practicable to do so. However, nothing in this policy shall prohibit Legrand from disclosing such information if the disclosure is required by law or is otherwise necessary to protect the health or safety of its workers, visitors and other persons.

9 WORK HEALTH AND SAFETY

- (a) Legrand has obligations under work health and safety legislation including an obligation to ensure, so far as is reasonably practicable, the health and safety of its workers, visitors and other persons at the workplace. This includes eliminating or minimising, so far as is reasonably practicable, exposure to and transmission of COVID-19 in the workplace.
- (b) Workers and visitors have obligations under work health and safety legislation. Workers and visitors have a duty to take reasonable care for their own health and safety as well as the health and safety of others. Workers and visitors must comply with Legrand's lawful and reasonable instructions including any reasonable policy or procedure relating to workplace health and safety.
- (c) This policy should be read in conjunction with Legrand's Workplace Health and Safety Policy and statement.

10 NO VICTIMISATION

- (a) Legrand does not tolerate unlawful discrimination, harassment, workplace bullying or victimisation and is intent on doing all that is reasonably practicable to prevent such behaviour at the workplace. This includes where such unlawful discrimination, harassment, workplace bullying or victimisation is because a person has or has not been vaccinated against COVID-19 (including the type of vaccine the person was given).
- (b) This policy should be read in conjunction with Legrand's Harassment, Discrimination and Bullying.

11 WHERE TO OBTAIN FURTHER INFORMATION

If a worker or visitor has any questions about this policy and how it applies to them, they should speak with their manager (in the case of a worker) and/or HR.

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12 BREACH OF THIS POLICY

- (a) Workers and visitors must act in accordance with this policy and all applicable laws.
- (b) Breach of this policy by a worker or visitor may result in refusal to grant access to, or removal from, Legrand's premises until such time as the worker or visitor complies with the requirements under this policy.
- (c) Breach of this policy by a worker may also result in disciplinary action up to and including termination of employment or engagement summarily (i.e. without notice).

13 REVIEW AND AMENDMENT

- (a) This policy does not form part of any contract or employment or contract for service.
- (b) Legrand may vary, replace or revoke this policy at any time and without notice.

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SCHEDULE 1: COVID-19 VACCINATION REQUIREMENTS

1. Persons required to have an up-to-date vaccination status or otherwise be vaccinated against COVID-19 under applicable law

Notwithstanding anything to the contrary in this policy, any person who is required to have an up-to-date vaccination status or otherwise be vaccinated against COVID-19 under applicable law must be vaccinated against COVID-19 in accordance with the timeframes set out in applicable law.

All persons (including workers and visitors) must familiarise themselves with the requirements under applicable law in respect of vaccination against COVID-19 (as amended from time to time) and ensure they fully comply with any such requirements at all times.

2. Visitors

All visitors to Legrand's premises (including its factories and other workplaces) may be required to have an up-to-date vaccination status (even if such persons are not required to be vaccinated under applicable law) as a condition of entering and/or remaining at the premises.

3. Workers in customer facing roles

Any worker employed or engaged by Legrand who, in the performance of their duties, is required to have in-person contact with customers, clients or other members of the public from time to time, must have an up-to-date vaccination status.

To the extent reasonably practicable, Legrand will respect the right of its customers and clients to choose to deal with workers who have an up-to-date vaccination status.

4. Other workers

It is Legrand's strong preference that all other workers have an up-to-date vaccination status.

All other workers must, prior to entering Legrand's premises:

- (a) have been tested for COVID-19 within the previous 5 days;
- (b) provided evidence of their negative COVID-19 test.

For clarity:

- (a) the worker must, if requested to do so by Legrand, produce the evidence of the test, together with evidence of the worker's name and place of residence, for inspection by Legrand;
- (b) the worker will be solely responsible for organising the COVID-19 test including any cost associated with undertaking the COVID-19 test;
- (c) the COVID-19 test must be performed outside of the worker's work hours; and

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- (d) being tested for COVID-19 is not an alternative to a requirement to be having an up-to-date vaccination status or otherwise being vaccinated against COVID-19 under applicable law (e.g. Public Health Orders) and/or this policy.

These testing requirements will not apply if a worker has provided evidence to Legrand of having an up-to-date vaccination status.