

## COVID-19 VACCINATION POLICY

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### 1 EXECUTIVE SUMMARY

- 1.1 Tassal's COVID-19 Vaccination Policy facilitates and supports the health and safety of all Tassal's workers and outlines the company's position on the provision of COVID-19 vaccination status and requirements for attendance for any person at Tassal's designated workplaces.
- 1.2 To determine the content of this Policy, an internal risk assessment of COVID-19, its subsequent variants and impact on employees was completed to identify potential risks, along with their likelihood and consequence.
- 1.3 From the hazard and associated risks identification and bowtie cause and effect analysis which has been undertaken, the following framework has been determined to ensure the health and safety of all our employees, contractors, and visitors.
- 1.4 Tassal considers attendance to any of its designated workplaces being limited to those persons who are COVID-19 vaccinated along with a combination of other mitigating controls to be a reasonably practicable control to minimise the risk of COVID-19.
- 1.5 Tassal may:
  - (a) lawfully direct any persons requiring or seeking entry to any of its designated workplaces to provide their COVID-19 vaccination status; and
  - (b) prohibit attendance for any person into any of Tassal's designated workplaces if they do not provide evidence of their COVID-19 vaccination status or are not fully vaccinated in accordance with this Policy.

### 2 INTRODUCTION AND OBJECTIVES

- 2.1 The object of this policy is to:
  - (a) provide guidance regarding Tassal's response to the management of COVID-19;
  - (b) consider the safety of Tassal's employees in respect of COVID-19;
  - (c) inform management and employees of Tassal's considerations in applying reasonable direction in respect to the provision of COVID-19 vaccination status and requirements for attendance for any person at Tassal's designated workplaces; and
  - (d) Safely provide Business continuity for Tassal and our Business Partners
- 2.2 COVID-19 is a highly transmissible novel Coronavirus causing mild to moderate symptoms in most individuals but can also cause serious illness requiring hospitalisation, death, and long-term health impacts even after recovery. Vaccination is highly effective in reducing the risk of serious illness and transmission. Unlike for established diseases, treatments for COVID-19 are currently limited.
- 2.3 COVID-19 vaccines are being offered to the public on a voluntary and free basis under the Department of Health's Australian COVID-19 vaccination policy.
- 2.4 For the purposes of this policy, "vaccination" or "vaccinated" is a reference to the requisite standard of vaccination published by the Department of Health from time to time, including booster vaccinations.
- 2.5 Vaccination is encouraged by the Australian Federal and State authorities, however currently there is no government mandated compulsory vaccination requirement applicable to Tassal's operations. If at any time there are government mandated compulsory vaccination requirements (e.g. Public Health

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Directions), Tassal will comply with those requirements.

- 2.6 Under Work Health and Safety obligations, Tassal must take reasonably practicable steps to ensure the health and safety of employees, contractors, and visitors at its workplaces. Reasonably practicable requires considering the likelihood and consequence and the availability of controls, in other words conducting a risk assessment then determining whether the controls are reasonable for the risk. Tassal generally considers vaccination along with a combination of other mitigating controls to be a reasonably practicable control to minimise the risk of COVID-19.
- 2.7 The Fairwork Ombudsman advises that an employer's requirement for employees to be vaccinated is only lawful in certain circumstances:
- (a) A specific law (such as a state or territory public health order) requires an employee to be vaccinated;
  - (b) The requirement is permitted by an enterprise agreement, other registered agreement, or employment contract;
  - (c) It would be lawful and reasonable for an employer to give their employees a direction to be vaccinated, which is assessed on a case-by-case basis.
  - (d) If Tassal assesses there is an unacceptable high risk of COVID-19 in or around one of its workplaces, Tassal may:
    - (i) give a reasonable direction for any persons requiring or seeking entry to any of its designated workplaces to provide their COVID-19 vaccination status; and
    - (ii) prohibit attendance for any person into any of Tassal's designated workplaces if they do not provide evidence of their COVID-19 vaccination status or are not vaccinated in accordance with this Policy.
- 2.8 If Tassal assesses there is a high risk of COVID-19 in or around one of its workplaces, Tassal may give a reasonable direction for site entry to be conditional upon persons being fully vaccinated against COVID-19, Tassal believe this to be a reasonably practicable control in reducing the risk of COVID-19
- 2.9 Regardless of whether a reasonable direction is in effect at a Tassal workplace, other COVID-19 control measures (e.g. mask wearing, social distancing, isolated teams, enhanced hygiene etc) may continue to be in place to the extent required in accordance with a risk assessment and to the extent required by public health authorities or safety regulators at the time.

## 3 CONSIDERATION FOR WORKPLACE SAFETY

- 3.1 Tassal has a primary Duty of Care to ensure so far as is reasonably practicable the health and safety of employees, visitors, and contractors at the workplace.
- 3.2 Reasonably Practicable means something which is, or was at a particular time, reasonably able to be done to ensure health and safety, considering, and weighing up all relevant matters.
- 3.3 Therefore, where the likelihood and degree of harm from COVID-19 is high, such as on-going high levels of transmission in the communities in which Tassal operates, or areas through which a Tassal employee is expected to travel for work is classified as high risk, Tassal considers restricting workplace access to only vaccinated persons, as well as other measures including but not limited to Rapid Antigen Testing ("RAT"), social distancing, isolating, masks, good hand hygiene etc are important control measures.. Vaccination generally is recognised as helping to prevent infection, reduce

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hospitalisation and mortality.

### 4 WHEN A COVID-19 RELATED DIRECTION IS IN EFFECT

4.1 When it is assessed there is a high risk from COVID-19, in line with considerations of worker and visitor safety, Tassal may:

- (i) give a reasonable direction for any persons requiring or seeking entry to any of its designated workplaces to provide their COVID-19 vaccination status; and
- (ii) prohibit attendance for any person into any of Tassal's designated workplaces if they do not provide evidence of their COVID-19 vaccination status or are not vaccinated in accordance with this Policy.

#### 4.2 Consultation and communication

When a COVID-19 related direction is in effect, Tassal will undertake consultation and communication including but not limited to:

- (a) providing information about COVID-19 vaccination so employees can make an informed decision to vaccination;
- (b) communicating the timeframes of when compliance with the direction is required;
- (c) promoting this policy within the organisation; and
- (d) taking reasonable steps to ensure that any potential breaches of this policy are identified, taken seriously, and acted upon appropriately and where applicable.

#### 4.3 Facilitating Vaccination

- (a) Tassal will also assist and facilitate employees with accessing vaccination. This may include but not be limited to assisting with bookings, on-site vaccination and allowing reasonable time off for employees to attend any COVID-19 vaccination appointment during working hours.
- (a) If an employee is a permanent or seasonal employee, they;
  - (i) will be paid their ordinary rate of pay for the time spent getting vaccinated during working hours up to 2 hours per dosage; and/or
  - (ii) are prevented from working due to any side effects of being vaccinated against COVID-19, they will access their personal / sick leave entitlements in accordance with Tassal's applicable leave policy. In the event they do not have accrued leave on a case-by-case basis we will consider options such special leave or access to accruals in advance.

#### 4.4 Exemptions of Compliance with Directions

- (a) All workers and visitors will be required to provide their COVID-19 vaccination status. There are no exemptions for this aspect of the policy.
- (b) An employee may be exempted from the workplace entry requirements to if and only if they:
  - i. Are unable to be vaccinated due to a medical contraindication and hold an exemption from a registered medical practitioner confirming this status; or
  - ii. Demonstrate exceptional circumstances as to why vaccination to the requisite standard

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cannot be achieved;

In determining “exceptional circumstances” in rule 4.4(b)(ii), we will take into account the following considerations:

- (i) inherent requirement of the role;
  - (ii) reasonableness of existing and/or alternative control measures;
  - (iii) operational requirements;
  - (iv) personal reasons of the individual; and
  - (v) health, safety and wellbeing of other persons at the workplace; and
- iii. Comply with any further reasonable directions and/or control measures where reasonably practicable relating to their ongoing participation at the workplace which may include and is not limited to any one or more of the following:
- (A) Alternative workplaces (e.g. working from home, remote work, restricted access [times and areas] etc);
  - (B) Alternative duties;
  - (C) Restricted customer or other personal contact;
  - (D) Wearing of PPE (e.g. masks, shields etc);
  - (E) Hygiene and sanitisation requirements;
  - (F) Contact tracing;
  - (G) Testing (e.g. temperature, rapid antigen etc);
  - (H) Taking of leave as agreed (e.g. annual, long service, without pay etc); or
  - (I) Any other reasonable measure considered necessary in the circumstances.

### 4.5 Evidence of vaccination status

- (a) Tassal will sight and note this information in accordance with our Privacy Policy and the Privacy Act. No electronic or hard copies of vaccination proof will be held or maintained
- (b) Tassal will only use COVID-19 vaccination information to:
  - (i) Comply with this policy, and any applicable law including public health orders;
  - (ii) Monitor and manage health and safety in the workplace; and
  - (iii) Monitor and manage employee absences due to injury or illness.

### 4.6 Other COVID-19 control measures

- (a) Other COVID-19 control measures may be in place or put in place at a site where a direction to

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vaccinate is in effect. These may include but not limited to:

- (i) PPE (e.g. shields/mask wearing);
- (ii) social distancing;
- (iii) enhanced hygiene and sanitisation;
- (iv) limited non-essential gathering and contact;
- (v) testing;
- (vi) contact tracing;
- (vii) leave arrangements;
- (viii) all people being aware of the symptoms of COVID-19 and isolating if they are displayed;
- (ix) segregation work arrangements; or
- (x) The WHS representative at the site can be consulted in relation to COVID-19 control measures.

### 5 OTHER DIRECTIONS TO VACCINATE

5.1 A small portion of Tassal employees may also be required to be vaccinated in the absence of Tassal issuing a direction for the employee to be vaccinated where it is an inherent requirement of their role and/or are required to enable compliance with contractual obligations. A typical scenario is where a Tassal employee as part of their role is required to visit the site of a customer or supplier who requires all persons visiting their site to be vaccinated against COVID-19.

#### 5.2 Refusal to comply with directions

When an employee is prohibited from attending a workplace in compliance with this policy Tassal may take the following additional steps to minimise risk by:

- (a) encouraging the employee to consult and seek personal medical advice so they can make an informed decision about whether to undertake or decline COVID-19 vaccination;
- (b) determining whether additional risk control measures could be implemented to the existing work arrangement with respect to the employee;
- (c) determining whether alternative work arrangements can be made (such as working from home, a different site etc);
- (d) requesting the employee to take leave (annual, LSL or leave without pay) until the risk of COVID-19 is considered acceptable; or
- (e) considering whether the employee has refused to follow a lawful and reasonable direction and if disciplinary action is warranted.
- (f) Continuing to implement other ongoing control measures which may include but not limited to:
  - (i) PPE (e.g. shield/mask wearing);

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- (ii) social distancing;
- (iii) enhancing hygiene and sanitisation;
- (iv) limiting non-essential gatherings and contact;
- (v) testing;
- (vi) contact tracing;
- (vii) leave arrangements;
- (viii) all people being aware of the symptom of COVID-19 and isolating if they are displayed; or
- (ix) segregated work arrangements.

5.3 The WHS department shall be consulted in relation to COVID-19 control measures.

**6 RESPONSIBILITIES**

<p><b>Executive team. For point 1, Minimum - Head of Department, Head of Safety, Head of People, Culture &amp; Communities Head of Risk</b></p>	<ul style="list-style-type: none"> <li>• Determine with Site management when a direction is lawful and reasonable</li> <li>• Promote this policy across Tassal</li> <li>• If acting as officers meet their due diligence obligations</li>   <li>• Business Continuity consideration</li> </ul>
<p><b>Site management</b></p>	<ul style="list-style-type: none"> <li>• Determine with Executive team when a direction is lawful and reasonable</li> <li>• Promote this policy in the workplace</li> <li>• Take reasonable steps to ensure that any potential breaches of this policy are identified, taken seriously, and acted upon appropriately and where applicable, if acting as officers meet their due diligence obligations</li> </ul>
<p><b>Employees</b></p>	<ul style="list-style-type: none"> <li>• Comply with lawful and reasonably directions and other COVID safe measures</li> </ul>
<p><b>Contractors/visitors</b></p>	<ul style="list-style-type: none"> <li>• Comply with lawful and reasonably directions and other COVID safe measures</li> </ul>
<p><b>P &amp; C or WHS Representative</b></p>	<ul style="list-style-type: none"> <li>• Maintain up to date information on the vaccination status of employees</li> <li>• Provide employment relation advice to site management in relation to a permission to enter the workplace and the implications of the direction</li> </ul>