

**Traffic Plan**  
**Vaccination, Testing, and Face Covering Policy**

**I. Purpose & Scope:**

Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation as a whole. This Vaccination, Testing, and Face Covering Policy (“Policy”) applies to all Traffic Plan (“Company”) employees except: employees who do not report to a workplace where other individuals (such as coworkers or customers) are present; employees while working from home; and employees who report directly to customer jobsites in their own vehicles or alone in a Traffic Plan vehicle and work exclusively outdoors.

The Company encourages all employees to be fully vaccinated in order to protect themselves and other employees. However, should an employee choose not to be vaccinated, this Policy’s sections on testing and face coverings will apply. Should the Company determine that certain employees are exempt from this Policy because they travel directly from their homes to customer jobsites in their own vehicles or alone in a Traffic Plan vehicle and work exclusively outdoors, the vaccination and testing provisions of this Policy will not apply; but sections related to face coverings will apply. In addition, it should be noted as to these employees that in order to be exempt, employees must refrain from travelling with other Traffic Plan employees in the same vehicle to or from customer jobsites. As such, in order to be exempt from this Policy on this ground, employees are required to use their own vehicle or travel alone in a Traffic Plan vehicle to and from customer jobsites.

Violations of this Policy may result in an employee being placed on unpaid administrative leave and/or subjected to disciplinary action up to and including discharge from employment. Also please note that while the Company permits testing and face coverings in lieu of vaccination, our customers may impose stricter requirements that require us to staff their work with vaccinated employees only. In that event, the Company will endeavor to reassign affected unvaccinated employees to other available work, if any. In the event the Company has no other available work, the Company reserves the right to place affected unvaccinated employees on unpaid administrative leave.

Employees may be legally entitled to a reasonable accommodation if medical necessity requires a delay in vaccination, or from vaccination and/or face covering requirements because of a disability or a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated by January 17, 2022 using forms provided by the Company upon request. All such requests will be handled in accordance with applicable laws, regulations and Company policies. Contact Human Resources if this applies.

This policy complies with OSHA’s Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501).

## **II. Policies & Procedures:**

### **Vaccination**

Employee who choose or are required to be vaccinated against COVID-19 must be fully vaccinated by no later than February 9, 2022. Employees are considered fully vaccinated two (2) weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses. For example, this includes two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, two weeks after a single-dose vaccine, such as Johnson & Johnson's vaccine, or two weeks after the second dose of any combination of two doses of different COVID-19 vaccines as part of one primary vaccination series. Any employee not fully vaccinated by then and/or not otherwise exempt from this Policy as determined by the Company will be subject to the regular testing requirements of this Policy.

### **Proof of Vaccination**

By January 17, 2022, employees must provide the Company with proof of COVID-19 vaccination or partial vaccination, attest to their intent to become fully vaccinated, indicate that they are not getting vaccinated, and/or notify the Company of the need for accommodation from vaccination or face covering requirements. Failure to provide this information shall result in the Company treating the employee as unvaccinated under this policy, and therefore subject to mandatory testing and use of a face covering when indoors and when occupying a vehicle with another person for work purposes. Proof of vaccination status can be submitted to Human Resources.

Acceptable proof of vaccination status is:

1. The record of immunization from a health care provider or pharmacy;
2. A copy of the COVID-19 Vaccination Record Card;
3. A copy of medical records documenting the vaccination;
4. A copy of immunization records from a public health, state, or tribal immunization information system; or
5. A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine(s).

Proof of vaccination generally should include the employee's name, the type of vaccine administered, the date(s) of administration, and the name of the health care professional(s) or clinic site(s) that administered the vaccine. In some cases, state immunization records may not include one or more of these data fields, such as clinic site; in those circumstances the Company will still accept the state immunization record as acceptable proof of vaccination.

If an employee is unable to produce one of these acceptable forms of proof of vaccination, despite attempts to do so (*e.g.*, by trying to contact the vaccine administrator or state health department), the employee can provide a signed and dated statement attesting to their vaccination status on a form to be provided by the Company. Contact Human Resources if this applies.

### **Time Off for Vaccination**

An employee may take up to four (4) hours of paid time per dose to travel to a vaccination site, receive a vaccination, and return to work. This would mean a maximum of eight (8) hours of paid time for employees receiving two (2) doses. If an employee spends less time getting the vaccine, only the necessary amount of paid time will be granted. Employees who take longer than four (4) hours to get the vaccine must provide the Company with an explanation documenting the reason for the additional time (e.g. need to travel long distances to get the vaccine). Any additional time requested will be granted, if reasonable, but will not be paid; in that situation, employees can elect to use accrued and available sick/PTO to cover the additional time. Employees who choose to be vaccinated outside of their normal work hours will not be compensated.

Employees may take up to two (2) days of paid sick time immediately following each dose if they have side effects from the COVID-19 vaccination that prevent them from working.

### **Employee Notification of COVID-19 & Removal from/Return to the Workplace**

Employees who test positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider will be removed from the workplace immediately and sent home and/or advised to seek medical care, as appropriate. Such employees will not be returned to the workplace until the employee receives a negative result on a COVID-19 nucleic acid amplification test (NAAT) following a positive result on a COVID-19 antigen test if the employee chooses to seek a NAAT test for confirmatory testing; meets the return to work criteria in CDC's "Isolation Guidance;" or receives a recommendation to return to work from a licensed healthcare provider. Under CDC's most recent guidance, employees who test positive (regardless of vaccination/booster status) should isolate for 5 days and, assuming they are still asymptomatic after 5 days, wear a face covering in the workplace for 5 days.

Employees who are exposed to COVID 19 AND are asymptomatic AND are unvaccinated OR who were vaccinated more than 6 months ago (Pfizer and Moderna) or 2 months ago (J&J) AND have not received a booster, should isolate for 5 days and, assuming they are still asymptomatic after 5 days, wear a face covering in the workplace for 5 days.

Employees who are exposed to COVID 19 AND are asymptomatic AND are BOTH vaccinated AND have received a booster are not required to quarantine after exposure if asymptomatic, but are required to wear a face covering in the workplace for 10 days.

### **COVID-19 Testing**

Employees who are not fully vaccinated by February 9, 2022 will be required to comply with the testing procedures set forth herein.

Employees who report to the workplace at least once every seven days:

- (A) must be tested for COVID-19 at their own expense at least once every seven days; and
- (B) must provide documentation of the most recent COVID-19 test result no later than the seventh day following the date on which the employee last provided a test result.

Any employee who does not report to the workplace during a period of seven or more days (*e.g.* working remote for two weeks prior to reporting to the workplace):

(A) must be tested within seven days prior to returning to the workplace; and

(B) must provide documentation of that test result to [the supervisor] upon return to the workplace.

If an employee does not provide documentation of a COVID-19 test result as required by this policy, they will be removed from the workplace until they provide a test result.

Employees who have received a positive COVID-19 test, or have been diagnosed with COVID-19 by a licensed healthcare provider, are not required to undergo COVID-19 testing for 90 days following the date of their positive test or diagnosis.

### **Face Coverings**

Effective immediately, employees who are not fully vaccinated must wear a face covering when indoors and when occupying a vehicle with another person for work purposes. Face coverings must: (i) completely cover the nose and mouth; (ii) be made with two or more layers of a breathable fabric that is tightly woven (*i.e.*, fabrics that do not let light pass through when held up to a light source); (iii) be secured to the head with ties, ear loops, or elastic bands that go behind the head. If gaiters are worn, they should have two layers of fabric or be folded to make two layers; (iv) fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face; and (v) be a solid piece of material without slits, exhalation valves, visible holes, punctures, or other openings. Acceptable face coverings include clear face coverings or cloth face coverings with a clear plastic panel that, despite the non-cloth material allowing light to pass through, otherwise meet these criteria and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker's mouth or facial expressions to understand speech or sign language respectively.

The following are exceptions to the Company's requirements for face coverings:

1. When an employee is alone in a room with floor to ceiling walls and a closed door.
2. For a limited time, while an employee is eating or drinking at the workplace or for identification purposes in compliance with safety and security requirements.
3. When an employee is wearing a respirator or facemask.
4. Where the Company has determined that the use of face coverings is infeasible or creates a greater hazard (*e.g.*, when it is important to see the employee's mouth for reasons related to their job duties, when the work requires the use of the employee's uncovered mouth, or when the use of a face covering presents a risk of serious injury or death to the employee).

### **Exceptions from Policy**

Employees may request an exception from applicable customer mandatory vaccination requirements if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Employees also may be legally entitled to a reasonable accommodation if they cannot be vaccinated and/or wear a face covering (as otherwise required by this policy) because of a disability, or if the provisions in this policy for vaccination, and/or testing for COVID-19, and/or wearing a face covering conflict with a sincerely held religious belief, practice, or

observance. Requests for exceptions and reasonable accommodations must be initiated by employees prior to January 17, 2022 and must be supported by medical or other documentation as lawfully required by the Company, using forms provided by the Company upon request. Contact Human Resources if this applies. All such requests will be handled in accordance with applicable laws, regulations and applicable Company policies.

Note: Exceptions from this Policy on the grounds set forth above are not the same as a Company decision that an employee may not be subject to *vaccination and testing requirements* because the employee reports directly to customer jobsites in their own vehicle or alone in a Traffic Plan vehicle and works exclusively outdoors. This type of determination is made by Traffic Plan, and the employee must still comport with all other requirements of this policy, including but not limited to providing proof of vaccination status, wearing face coverings, notifying the Company of positive test results, etc...

### **New Hires**

All new employees are required to comply with the vaccination, testing, and face covering requirements outlined in this policy as soon as practicable and as a condition of employment. Potential candidates for employment will be notified of the requirements of this policy prior to the start of employment.

### **Confidentiality and Privacy**

All medical information collected from individuals, including vaccination information, test results, and any other information obtained as a result of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.

### **Questions**

Please direct any questions regarding this policy to Human Resources.