

# Healius Group COVID-19 Vaccination Policy

## 1. Introduction

- a) As a healthcare company, Healius has a duty of care to protect both the public and our people, particularly those at higher risk of more serious illness or who unable to be vaccinated themselves. The latest Public Health Advice is that vaccination is a highly effective way to protect ourselves, our families and our patients against Delta and other variants of COVID-19.
- a) Many of our people are already vaccinated as health workers and this Policy will ensure Healius has a consistent approach, helping to protect all our people, no matter their role, against COVID-19.
- b) This Policy imposes COVID-19 vaccination requirements on our people at Healius, across all employment types, including full time, part time, casual, independent contractors and workers engaged via labour hire companies.

## 2. Principles

- a) Healius is committed to providing a safe working environment and taking all reasonably practicable steps to ensure that its people and the community are protected against vaccine-preventable diseases.
- b) The purpose of this Policy is to facilitate the protection of all persons who perform work on behalf of Healius and who regularly attend or may regularly be attending any of Healius' workplaces or worksites, by requiring that all such persons be vaccinated against COVID-19. This includes directors, medical and health practitioners, employees, contractors and labour hire personnel.
- c) This Policy operates in conjunction with, and does not replace, any applicable Public Health Order. To the extent that any person is required to comply with a Public Health Order (which may include first and second dose requirements earlier than as set out in this Policy), they must comply with that order as required by law.
- d) This Policy covers mandatory vaccination requirements with respect to a COVID-19 Vaccine. This Policy does not cover requirements relating to COVID-19 testing at worksites, provision and use of PPE, government isolation requirements and any other government directions or partner requirements relating to COVID-19.

## 3. Scope

- a) The Healius Group COVID-19 Vaccination Policy (Policy) applies to:  
Healius Limited, all its subsidiary companies (together, Healius Group ("Healius")) and the following persons who perform work on behalf of Healius:
  - i. Directors.
  - ii. Medical and health practitioners (including visiting medical officers).
  - iii. All employees (whether permanent, fixed term, maximum term or casual).
  - iv. Independent contractors.
  - v. Labour hire personnel.
  - vi. Commercial partners who regularly provide services at Healius workplaces or worksites, including cleaning or maintenance services.

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- vii. Persons undertaking placements as part of their study at an educational or training institution, including persons undertaking student / vocational / professional placements, internships and/or secondments.
- viii. Potential employees or candidates.
- b) This Policy does not cover patients. Patients are entitled to seek medical or health services from any one of Healius' workplaces or worksites, without being required to have a COVID-19 Vaccine, and without being asked whether they have or have not had a COVID-19 Vaccine. Patients are not required to provide any Vaccination Evidence or exemption certificates to Healius.
- c) This Policy does not cover visitors to Healius' workplaces or worksites, including persons providing consulting services to the Group (such as strategic, auditing, financial, technical, specialist, human resources, legal and IT services) unless Healius specifically advises that this Policy applies to such visitors.
- d) This Policy operates in conjunction with other relevant Healius policies as well as applicable Awards/Agreements and/or relevant legislation (including any Public Health Order). To the extent that a person has greater obligations in a Public Health Order, they must comply with that order as required by law.
- e) This Policy supersedes in its entirety all other policies relating to COVID-19 vaccinations. To the extent of any inconsistency between any other COVID-19 vaccination policies and this Policy, this Policy will prevail.
- f) Healius has the right to review, vary, add to, or withdraw this Policy or any portion of this Policy from time to time in its absolute discretion. You must comply with the obligations set out in this Policy however, the obligations on Healius do not form part of your contract of employment and are not binding on Healius.

## 4. Responsibilities

### 4.1. Chief Executive Officer

Owns the COVID-19 Vaccination Policy and is responsible for reviewing and maintaining the policy on a regular basis.

### 4.2. Managers Responsibilities

Responsible for:

- i. promoting and encouraging compliance with this Policy;
- ii. informing others about this Policy and the possible consequences resulting from a breach of this Policy;
- iii. monitoring the working environment to ensure that this Policy is being complied with;
- iv. ensuring that anyone subject to this Policy provides all relevant records (including, but not limited to, Vaccination Evidence and exemption certificates);
- v. maintaining an accurate and up-to-date record register of supporting documentation evidencing compliance with this Policy;
- vi. modelling appropriate behaviour with respect to COVID-19, a COVID-19 Vaccine and the requirements set out in this Policy; and
- vii. providing support and guidance in relation to application of this Policy; and
- viii. promptly raising to your manager any concerns about conduct which may be inconsistent with or in breach of this Policy.

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## 4.3. Individual Responsibilities

You are, at all times, responsible for:

- i. reading, understanding, complying with, and upholding the requirements set out in this Policy;
- ii. ensuring your conduct is compliant with this Policy and does not create risks to you or others;
- iii. promoting and encouraging compliance with this Policy;
- iv. organising, booking and attending medical appointments in order to comply with this Policy;
- v. providing via the nominated system, in a timely manner, all accurate and up-to-date records, certificates and documentation evidencing compliance with this Policy;
- vi. communicating and engaging with your manager about any matter which may affect your ability to comply with the requirements in this Policy;
- vii. seeking assistance from your manager if you have questions about the application of this Policy;
- viii. ensuring you do not engage in any activity which may be inconsistent with or constitute a breach of this Policy; and
- ix. promptly raising with your manager, any concerns about conduct by you or others which may be inconsistent with or in breach of this Policy.

## 5. Requirements

### 5.1. Requirement to be vaccinated against COVID-19

- a) Where you are covered by this Policy, in order to perform any work on behalf of Healius at any Healius workplace or worksite, it is a requirement to:
  - i. have received at least 1 dose of a COVID-19 Vaccine by 1 December 2021; and
  - ii. be Fully Vaccinated with a COVID-19 Vaccine by 31 December 2021.
- b) For the avoidance of doubt, any person commencing employment or engagement with Healius on or after the date the date of this Policy, must comply with the requirements set out in this Policy as a pre-condition to employment or engagement with Healius.
- c) The requirements set out in this Policy are in addition to any COVID-19 Vaccine requirements which may be applicable to you by law (including from a Public Health Order or other legislation). Where you are legally required to receive any dosage of a COVID-19 Vaccine at a date earlier than as set out in this Policy, you must comply with that earlier date.

### 5.2. Evidence of a COVID-19 Vaccine

- a) Accurate and up-to-date Vaccination Evidence must be provided to Healius via its nominated system (currently, Flare HR).
- b) Healius recognises that it may be difficult to access a COVID-19 Vaccine. If you are unable to access a COVID-19 Vaccine, you must provide acceptable evidence of a confirmed booking to receive the relevant dosage of a COVID-19 Vaccine in accordance with this Policy.
- c) Anyone who is unable to make a booking for a COVID-19 Vaccine should speak to their Manager immediately.

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## 5.3. Exemptions

- a) The requirements set out in this Policy, do not apply if you are unable, due to a Medical Contraindication, to receive all approved COVID-19 Vaccines.
- b) If you are unable to receive all approved COVID-19 Vaccines due to a Medical Contraindication you must provide evidence of your exemption by providing a certificate which is:
  - i. in the format authorised under any applicable Public Health Order; or
  - ii. a medical certificate which is issued by a qualified medical practitioner with a current and valid registration that certifies you have a Medical Contraindication to all approved COVID-19 Vaccines. Any certificate provided in this respect must clearly specify the medical practitioner’s registration details, your Medical Contraindication and that the contraindication means you are unable to receive all approved COVID-19 Vaccines.

## 6. Information provided to Healius

- a) Any information provided to Healius in connection with this Policy must be accurate and truthful and Healius reserves the right to verify its authenticity.
- b) Any records (including Vaccination Evidence or exemption certificates) collected by Healius as a result of this Policy will be treated as confidential and be handled and stored in compliance with applicable privacy legislation.

## 7. Breach of this policy

- a) You are required to comply with any obligations placed upon you under this Policy.
- b) Where there is reason to believe that the requirements outlined in this policy have been breached, have failed to be upheld or conduct has occurred that is inconsistent with this Policy, this will be addressed in accordance with the Workplace Investigation Guidelines which may result in disciplinary action, up to and including suspension without pay and/or dismissal.

## 8. Other documents relevant to this Policy are:

- (a) WHS Policy;
- (b) Workplace Investigation Policy
- (c) Grievance and Complaints Policy;
- (d) Healius Group IT Acceptable Use Security Policy;
- (e) Healius Group Social Media Policy;
- (f) any applicable Enterprise Agreement/Award;
- (g) operational procedures and local business unit policies relating to COVID-19 work health and safety, and risk management; and
- (h) Infection Prevention and Control Policy

## 9. Definitions

“Contractor” includes, but is not limited to, Visiting Medical Officers (VMOs), surgical assistants, allied health workers, nursing and medical students on clinical placements, company representatives attending theatre,

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- workers engaged on a contract of service, vendors and trade contractors (such as cleaners or service technicians).
- “COVID-19” means a condition caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).
- “COVID-19 Vaccine” means a vaccine approved by the TGA for use as a vaccine against COVID-19.
- “COVID-19 Test” includes a test for COVID-19 approved by the TGA, such as Rapid Antigen Testing (RAT) or Polymerase Chain Reaction (PCR) testing.
- “Fully Vaccinated” means having obtained the manufacturer’s recommended dosage of any COVID-19 Vaccine. For example, where a two-dose schedule is recommended by the manufacturer, a person will be considered fully vaccinated when they have received both doses of the vaccine. Where the Australian Technical Advisory Group on Immunisation (ATAGI) has recommended an additional or booster schedule, a person will be considered fully vaccinated when they have received the additional or booster dose of the vaccine in accordance with ATAGI’s recommendations.
- “Medical Contraindication” means a medical contraindication in accordance with the clinical guidance published by ATAGI, as amended from time to time.
- “Policy” means this Healius Group COVID-19 Vaccination Policy, as amended from time to time.
- “PPE” means personal protective equipment.
- “Public Health Order” means any applicable order or direction issued on behalf of a government body regarding COVID-19 (including any orders or directions issued by the Federal, State and Territory governments in Australia), as amended from time to time.
- “TGA” means the Therapeutic Goods Administration of the Commonwealth.
- “Vaccination Evidence” means evidence from the Australian Immunisation Register kept under the Australian Immunisation Register Act 2015 (Cth) that the person to whom the evidence refers to has had 1 or more doses of a COVID-19 Vaccine. For the avoidance of doubt, vaccination evidence would include an online immunisation history statement or COVID-19 digital certificate from the Australian Immunisation Register.

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