

December 20, 2021

## COVID-19 Vaccination Policy - Event Attendance & Participation

### 1. POLICY

NORDIQ CANADA (the “**Organization**”) is committed to taking every reasonable precaution in the circumstances for the protection of the health and safety of employees, athletes, and all stakeholders from the hazard of COVID-19. This Policy is intended to encourage, support and maximize COVID-19 Vaccination rates and safety at the Organization as one of the critical preventatives and control measures for the hazard of COVID-19. The Organization is also committed to compliance with all applicable public and occupational health and safety, human rights, privacy, and other laws in the development and implementation of this Policy.

### 2. SCOPE AND APPLICABILITY

This Policy applies to all attendees of events organized or hosted by the Organization, including but not limited to athletes, volunteers, and other participants.

### 3. DEFINITIONS

“**COVID-19**” is the infectious disease caused by SARS-CoV-2.

“**Organization Activities**” means all activities related to the Organization’s operations, whether conducted on or off Organization Premises, including events and travel.

“**Organization Premises**” includes, but is not restricted to, all land, property, structures, installations, vehicles or equipment owned, leased, rented, operated, used, or otherwise controlled by the Organization for the purpose of conducting Organization Activities. It does not include a Participant’s personal residence.

“**Participants**” includes all athletes, support staff, parents, guardians, volunteers and any attendees that attend Organization Activities who are eligible to get vaccinated in Canada.

“**Proof of Vaccination**” refers to government issued documentation demonstrating that an individual has been Vaccinated along with government issued photo identification that matches the individual.

“**Vaccine(s)**” refers to a vaccine approved by Health Canada for use in Canada in relation to COVID-19.

“**Vaccination**” refers to the administration of a Vaccine(s) to protect individuals from COVID-19. It may include the administration of one or more doses of Vaccine.

“**Vaccinated**” refers to an individual who has received all doses of a Vaccine, recommended or required by Health Canada, to produce an immune response to COVID-19.

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#### **4. VACCINATION**

Health Canada, the federal and provincial governments, the Public Health Agency of Canada, regional public health authorities, the Canadian Medical Association have all endorsed voluntary COVID-19 Vaccination for all adults who may safely receive a Vaccine.

**The Organization requires that all Participants be Vaccinated at least 14-days prior to engaging in Organization Activities or entering the Organization Premises.** Participants must provide proof of Vaccination prior to entering the Organization Premises or participating in Organization Activities.

Participants who are not Vaccinated or do not provide adequate Proof of Vaccination may be barred from entry or use of Organization Premises and participation in Organization Activities.

#### **5. CONTINUED APPLICATION OF HEALTH AND SAFETY MEASURES**

Nothing in this Policy relieves Participants, even those who are Vaccinated, from their obligation to comply with applicable health and safety measures required or recommended by the provincial public health authorities and related Organization policies in effect to reduce the spread of COVID-19.

Furthermore, when travelling to other countries, Participants are required to follow the laws, recommended guidelines and protocols issued by local government, while out of country. At minimum, when Participants are travelling to other countries with the Organization, the Participants are required to comply with applicable health and safety measures required or recommended by Canadian provincial public health authorities and related Organization policies in effect to reduce the spread of COVID-19.

#### **6. ACCOMMODATION**

##### **a) Accommodation for Participants Who Cannot Be Vaccinated**

The Organization is committed to an environment free from discrimination and harassment in accordance with applicable human rights laws. The Organization will accommodate Participants from the strict application of this Policy who qualify based on one or more of the protected grounds of discrimination, in the applicable human rights laws, up to the point of undue hardship.

Participants seeking accommodation are required by law to self-identify the specific prohibited ground of discrimination they believe Vaccination would infringe and also participate in the accommodation process, including, but not limited, to providing information to establish the existence of a protected grounds, related restrictions and possible methods of accommodation. To discuss possible exemptions and related accommodation under this Policy, eligible Participants should contact **Megan Begley, Chief Operating Officer** ([mbegley@nordiqcanada.ca](mailto:mbegley@nordiqcanada.ca)).

Participants seeking accommodation must obtain approval prior to entering any Organization Premises or participating in any Organization Activities.

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## **7. PRIVACY**

### **a) Short Term Participants**

Short-term participation or attendance includes spectators to Organization events and visitors that do not regularly attend Organization Premises or are not required to attend at Organization Premises for the purpose of engaging in Organization Activities.

Vaccination status information for Participants that only enter Organization Premises or take part in Organization Activities on a short-term basis will not be collected or stored after Proof of Vaccination has been verified.

### **b) Regular Participants and Participants that travel with the Organization**

#### *The Purposes of the Collection, Use and Disclosure of Vaccination Status Information*

For regular Participants and Participants that travel with the Organization, Vaccination status will be collected, and may be used and disclosed pursuant to the terms of this Policy, the *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”) and other applicable provincial privacy legislation, where it exists. Vaccination status information will only be collected, used and disclosed as required for the reasonable purpose of:

1. taking all reasonable precautions during the pandemic to ensure the health and safety of everyone in the Organization through appropriate health and safety planning based on Vaccination status;
2. limited disclosure, where necessary, to international federations or organizations running competitions or events or when determined to be necessary by the Organization; and
3. administering this Policy.

The Organization also reserves the right to disclose Vaccination status information to partners for the purposes of facilitating Organization Activities, and will provide advance notice to the relevant Participant before so doing.

The collection, use or disclosure of this information will be based on the following terms:

1. Participants are to disclose their Vaccination status to the Organization on a proactive and ongoing basis or otherwise as directed in accordance with this Policy and may be asked to execute their written consent in the form appended as Schedule “A” to this Policy;
2. Participants who have completed a consent form will be asked to provide a copy of their certificate of Vaccination or other appropriate government issued alternative documentation so that the Organization can confirm their Vaccination status. Only the Vaccination status of the Participant will be recorded by the Organization;

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3. The Organization will keep the Participants' Vaccination status confidential in accordance with PIPEDA and applicable privacy and health laws. Specifically, this information will only be shared and accessed on a need-to-know basis, solely for the purposes outlined above, or to comply with a legal order to disclose the information;
4. The information will be securely stored and maintained by the Organization in a separate file; and
5. This information will only be retained for the duration of the Participant's relationship with the Organization and will be destroyed thereafter. Subject to official guidance on the outcome of the COVID-19 pandemic, it may be destroyed earlier, in which case a general notification will be communicated.

## **8. RESPONSIBILITIES**

All levels of management of the Organization are responsible for the administration of this Policy in accordance with applicable law.

Participants are responsible for compliance with this Policy and shall comply with all applicable COVID-19 legal obligations in doing so, including with respect to public health measures such as physical distancing, wearing a mask, and staying home if they are sick.

## **9. AMENDMENTS**

The Organization will review this policy and update it as required and as reasonable in the evolving nature of the pandemic, Vaccine availability and government and public health authority direction.

## **10. REVIEW AND APPROVAL**

This Policy has been reviewed and approved by Stephane Barrette, Chief Executive Officer, on December 20, 2021.

## **11. REVISION HISTORY**

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## Schedule “A”

### Express Consent Form for Regular Participants and Travelling Participants – COVID-19 Vaccination Information

This document is an express consent for the collection, use and disclosure of COVID-19 Vaccination status. By agreeing with this Consent, you are giving permission for the Organization to collect, use and disclose your personal information as described above for the following purposes:

- to take all reasonable precautions for the health and safety of employees, contractors, coaches, athletes, support staff, parents, guardians and volunteers in the Organization;
- to make decisions regarding athletic participation, particularly where Participants must directly interact with employees, contractors, coaches, athletes, support staff, parents, guardians, volunteers and others;
- to provide limited disclosure to international federations or organizations running competitions or events, or when reasonably required to facilitate the Organization’s Activities; and
- for administering the Organization’s COVID-19 Vaccination Policy – Event Attendance & Participation.

Personal information will be kept in a separate file and appropriate safeguards will be taken. It will be accessed only on a need-to-know basis, solely for the purposes outlined above, or to comply with a legal order to disclose the information.

Your information is being collected, used and disclosed pursuant to the Organization’s COVID-19 Vaccination Policy. The information will only be retained for the duration necessary.

#### Express consent

I hereby agree and consent that the Organization may collect, use and disclose my COVID-19 vaccination status information for the purposes of this Policy as described above.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_