

PROGRAM PRODUCTIONS, INC. COVID-19 VACCINATION POLICY

PART 1 POLICY

Purpose: PROGRAM PRODUCTIONS, Inc. (“PPI”) issues this COVID-19 Vaccination Policy (“this “Policy”) in compliance with the OSHA COVID-19 Vaccination Standard (the “Standard”) codified at 29 CFR 1910, et seq., and with the intent of furthering the goal of reducing the presence and severity of COVID-19 cases in the workplace and thereby safeguarding the health of our employees from the hazard of COVID-19.

This Policy summarizes the statutory requirements of the Standard. Additional information and details relating to this Policy, as well as specific provisions which relate to this Policy are contained in the actual Federal Standard, can be found in the Employees’ section of Program Productions’ website and you are encouraged to review those materials for guidance. PPI will reconcile any conflict between this Policy and the Standard.

Scope and Application of OSHA Standard: **In its Standard, OSHA has stated that the Standard applies to PPI as an employer with a total of 100 or more employees.**

Further, OSHA has declared that the Standard preempts inconsistent State and Local requirements that ban or limit the authority to require vaccination, face covering, or testing.

Therefore, in compliance with the Federal Standard, PPI’s COVID-19 Vaccination Policy will apply to all PPI employees and in all jurisdictions.

PPI, however, anticipates that the Standard will be the subject of protracted litigation and PPI will modify this Policy when and as appropriate to comply with applicable law.

NOTE: YOU DO NOT NEED TO RESUBMIT YOUR VACCINATION CARD IF YOU HAVE ALREADY SUBMITTED PROOF OF FULL VACCINATION.

All PPI employees eligible for assignment to work for PPI on Events on and after December 6, 2021, must be either:

1. Fully vaccinated against COVID-19 and have submitted their COVID-19 Vaccination Record Card; or,
 2. Have requested an exemption and been granted an exemption or accommodation.
- Fully Vaccinated against COVID-19: Employees are considered fully vaccinated against COVID-19 two weeks after completing primary vaccination with a COVID-19 vaccine, with, if applicable, the minimum recommended interval between doses. For example, this includes two weeks after a second dose in a two-dose vaccination series, such as the Pfizer or Moderna vaccines, two weeks after a single-dose vaccine, such as the Johnson & Johnson 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. All employees

are required to provide PPI with proof of vaccination against COVID-19 in order to be considered eligible for hire. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if applicable, their testing results. Employees who submit false or misleading information to PPI will be subject to discipline through and including removal from PPI's hire eligibility roster. **Proof of vaccination must be received by PPI on or before November 17, 2021, to be considered eligible for employment on and after December 6, 2021.**

Exception and Accommodation: Employees may request an exception from this Policy and a reasonable accommodation if they are medically precluded from, or ineligible to receive, the vaccine, or medical necessity requires a delay in vaccination. Employees also may request a reasonable accommodation if they cannot comply with this Policy because of a disability, or if the provisions in this Policy conflict with their sincerely held religious belief, practice, or observance. **Requests for exceptions and reasonable accommodations must be received by PPI on or before November 17, 2021.**

All accommodation requests will be handled individually, on a case-by-case basis, and in accordance with applicable laws and regulations and PPI policies and procedures. Although reporting and providing proof of full vaccination is an automated process at PPI, and thus managed in real time, reviewing, and responding to requests for accommodation is a manual and individualized process which places a burden on PPI's resources. PPI will respond to such requests as promptly as practical, but you should expect that delays will occur. Additionally, your timely submission of forms or other materials required and cooperation as part of that process is necessary to mitigate against further delays. Further information regarding PPI's COVID-19 Vaccination Accommodation Policy is contained in PART 2 of this Policy.

Procedures: Overview and General Information: PPI employees must be fully vaccinated to work Events on and after December 6, 2021.

Nearly 5,000 PPI employees have already submitted proof of full vaccination against COVID-19 and are therefore eligible for assignment to Events under this Policy. However, for those employees who have not yet submitted proof of full vaccination, to be eligible for assignments occurring on and after December 6, 2021, you must submit proof of full vaccination against COVID-19 no later than November 17, 2021.

NOTE: Employees will not be considered fully vaccinated against COVID-19 until two weeks after receiving the requisite number of doses of a COVID-19 vaccine.

Information relating to how employees may schedule vaccination appointments, e.g., through an on-site clinic, through their own medical provider, or with a mass-vaccination clinic, are available on the web <https://www.vaccines.gov/> and at numerous other public sites.

Acceptable Proof of Vaccination: Proof of vaccination status against COVID-19 should be submitted via the ProCrewz App. Employees who fail to submit proof of vaccination will be considered to be unvaccinated against COVID-19.

Proof of full vaccination against COVID-19 means a copy of the employee's COVID-19 Vaccination Record Card.

The COVID-19 Vaccination Record Card must include the employee's name, the type of vaccine administered, the date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) that administered the vaccine.

If an employee is unable to produce their COVID-19 Vaccination Record Card 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 COVID-19 vaccination status; attesting that they have lost and are otherwise unable to produce their COVID-19 Vaccination Record Card; and including the following language:

I declare that I have lost and am unable to produce my proof of vaccination and that I have made a diligent effort to obtain this proof through the vaccine administrator or state health department. This statement about my vaccination status is true and accurate. I understand that knowingly providing false information regarding my vaccination status may result in my removal from PPI's eligibility for hire list and may also subject me to criminal penalties.

An employee who attests to their COVID-19 vaccination status in this way must include in their attestation the type of COVID-19 vaccine administered, the date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) administering the vaccine. This employee attestation should be submitted to Human Resources at hr@programproductions.com.

In order to be eligible to work events on and after December 6, 2021, all employees who have not already done so must inform PPI of their COVID-19 vaccination status. The following sets forth the requirements for submitting COVID-19 vaccination status documentation.

Employees who are fully vaccinated against COVID-19: Submit proof of full COVID-19 vaccination by November 17, 2021.

Employees who are partially COVID-19 vaccinated (i.e., one dose of a two dose vaccine series), or less than 14 days since completion of vaccination: Submit proof of partial COVID-19 vaccination by November 17, 2021. Proof of partial COVID-19 vaccination must indicate when the vaccination (s) was received. PPI policy regarding COVID-19 partially vaccinated employees is set forth in PART 2 of this Policy.

Employees that do not provide either proof full vaccination, or proof of partial vaccination or submit an exemption request by November 17, 2021, will be cancelled and released from all current job confirmations on and after December 6, 2021, and will no longer be eligible for future work with PPI, until the employee is in full compliance with this Policy.

Employees who are subsequently vaccinated / new employees: Submit proof of COVID-19 vaccination when fully vaccinated against COVID-19. Such employee will then be considered for assignment as circumstances warrant.

Employee Notification of COVID-19 and Removal from the Workplace: As required by 29 CFR 1910.501, **PPI employees must promptly notify their PPI Crewing Manager via email when they have tested positive for COVID-19 or have been diagnosed with COVID-19** by a licensed healthcare provider.

Medical Removal from the Workplace: It is PPI's policy to keep COVID-19 positive employees away from the workplace and potentially exposing other employees to COVID-19. PPI will immediately remove an employee from the workplace if they have received a positive COVID-19 test or have been diagnosed with COVID-19 (i.e., immediately send them home or to seek medical care, as appropriate).

Return to Work Criteria: If an employee is removed because they are COVID-19 positive, they may not return to work until the employee: receives a negative result on a Valid COVID-19 test and are in compliance with the Standard.

Pursuant to current CDC guidance, asymptomatic employees may return to work once 10 days have passed since the positive test, and symptomatic employees may return to work after ALL of the following are true:

- At least 10 days have passed since symptoms first appeared, and
- At least 24 hours have passed with no fever without fever-reducing medication, and
- Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).

If an employee has severe COVID-19 or an immune disease, PPI will follow the guidance of, and certification by a licensed healthcare provider regarding return to work.

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.

Requirements of Leagues, Venues, Clients: In order for PPI employees to be considered qualified and eligible to work an event, the employee must, in addition to complying with this Policy, also comply with all requirements of the involved League, Venue, Client, or others having control of the event. PPI has no control over the requirements of these other entities or over the issuance of credentials allowing access to the facilities in which events occur. COVID vaccination requirements of these other entities have changed over time, and we expect these requirements to continue to evolve as circumstances continue to develop.

Questions: Please direct any questions regarding this Policy to Human Resources at hr@programproductions.com.

PART 2 EXEMPTIONS AND ACCOMMODATIONS

Purpose: PROGRAM PRODUCTIONS, Inc. (“PPI”) issues this COVID-19 Vaccination Accommodation Policy in compliance with the OSHA COVID-19 Vaccination Standard (the “Standard”) and as Part 2 of PPI’s COVID-19 Vaccination Policy so as to address and accommodate those employees who are requesting an exemption from this Policy.

Scope: PPI employees who are not fully vaccinated against COVID-19, but submit a request for accommodation by the later of: November 17, 2021; or one-month prior to the date they are tentatively scheduled to work for PPI.

Partially Vaccinated, New Employees, Exemptions, and Accommodations:

Partially Vaccinated Employees: Employees who are partially COVID-19 vaccinated and who have submitted proof in accordance with Part 1 of this Policy will be required to undergo testing and wear a face covering, each as set forth below.

New Employee: New employees must comply with PPI’s COVID-19 Vaccination Policy and will be considered eligible for hire upon compliance with this Policy.

Exemptions and Accommodations: PPI employees who are not fully vaccinated, upon application and approval, may be exempted from or accommodated such that they will not be required to be vaccinated against COVID-19. The circumstances for such an exemption or accommodation are limited to the following:

- Employees who are medically precluded from, or ineligible to receive, the vaccine;
- Employees who, as a medical necessity, require a delay in vaccination; or,
- Employees who are legally entitled to a reasonable accommodation under federal civil rights laws because they have a disability, or sincerely held religious beliefs, practices, or observances, that conflict with PPI’s vaccination requirements.

Employees who have received an exemption and/or accommodation from PPI must provide proof of regular testing for COVID-19 and wear a face covering in accordance with the following:

Testing: COVID-19 testing, as set forth below, will apply to employees who have been granted an accommodation.

In order for PPI to consider an employee who has been granted an accommodation from vaccination to be eligible for assignment, the employee:

- Must pass a Valid COVID-19 Test at least once every 7 days; and
- Must provide documentation of the most recent Valid COVID-19 Test result to PPI no later than the 7th day following the date on which the employee last provided a test result. Documentation is to be submitted to CovidTest@ProgramProductions.com.

Valid COVID-19 Test: A Valid COVID-19 test means a test for SARS-CoV-2 that is: Cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the FDA to detect current infection with the SARSCoV-2 virus (e.g., a viral test);

- Administered in accordance with the authorized instructions; and

- Not both self-administered and self-read unless observed by an authorized health proctor. Examples of tests that satisfy this requirement include tests with specimens that are processed by a laboratory, proctored over-the-counter tests, point of care tests, and tests where specimen collection and processing is either done or observed by an authorized proctor.

Face covering: PPI requires employees who are not fully vaccinated to wear a face covering when working. A face covering means a covering that:

- Completely covers the nose and mouth;
- Is 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);
- Is secured to the head with ties, ear loops, or elastic bands that go behind the head;
- Fits snugly over the nose, mouth, and chin with no large gaps on the outside of the face; and
- Is a solid piece of material without slits, exhalation valves, visible holes, punctures, or other openings.

This definition includes 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 this definition 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.

COVID-19 Testing and Face Coverings: Pursuant to the Standard and this Policy, COVID-19 Testing and Face Coverings are required for those employees who are granted an accommodation because they have elected to request a personal exemption from this Policy. As such, those employees who are granted a personal accommodation by PPI will be required to pay for their own COVID-19 Testing and Face Coverings unless otherwise mandated by law.