



STAFF and EMPLOYEE POLICY COVID-19 VACCINATION AND TESTING

I. Statement of the Policy

Happy Faces Personnel is committed to taking every precaution to safeguard the health and well-being of its employees, staff, customers, and our family members and extended communities. In support of this commitment to implement any measures possible to mitigate the spread of the disease, Happy Faces Personnel will require all its staff and employees—regardless of assignment location, nature, or length—as a condition of employment to either 1) be immunized by vaccination against COVID-19 or 2) be tested weekly for COVID-19. This condition of employment is mandatory unless an employee is granted an exemption or when otherwise not permitted by law.

This policy is designed to protect the health of the Happy Faces workforce to the greatest extent possible and to serve as a public health measure for those within the broader Happy Faces community. The COVID-19 vaccines currently available in the United States are highly effective at decreasing the likelihood of contracting COVID-19, preventing serious illness in vaccinated individuals who contract COVID-19, and mitigating spread of the disease. Employees with a disability or other medical restriction that affects their eligibility for a vaccine, as verified by their medical provider, or those with a sincerely held religious belief that prohibits them from receiving a vaccine, may request an exemption from this vaccination requirement.

This policy is intended to comply with all federal, state, and local laws and is based upon guidance provided by the U.S. Centers for Disease Control and Prevention (CDC), the U.S. Department of Health and Human Services, the Georgia Department of Public Health, the Fulton County Board of Health, and public health and licensing authorities, as applicable. However, this policy does not assume any legal duty not mandated by law.

II. Applicability

This policy applies to all Happy Faces staff and employees.

III. Establishment and Implementation of Procedure



The Happy Faces Director of Organizational Development (Human Resources Division), in consultation with the Happy Faces CEO, is authorized to establish and modify, as needed, a procedure for implementing this policy.

IV. Definitions

- “Booster dose” refers to an additional dose of a vaccine, beyond the dose(s) required for initial vaccination, which is intended to boost immunity to COVID-19.
- “Contraindications” refers to a contraindication to COVID-19 vaccination recognized by the U.S. Centers for Disease Control and Prevention (“CDC”), or by the vaccine’s manufacturer, as based on a condition in the potential vaccine recipient that may increase the risk for a serious adverse reaction to the vaccine, may cause diagnostic confusion if the vaccine is administered, or may compromise the ability of the vaccine to produce immunity. “Contraindications” are limited and do not include conditions that are unrelated to vaccines or injectable therapies, such as food, pet, venom, or environmental allergies, or allergies to oral medications.
- “COVID-19 testing” or “COVID-19 test” refers to completion of a polymerase chain reaction/nucleic acid amplification test (PCR)(NAAT) recognized by the CDC to detect COVID-19 infection, but not to include an anti-bodies test. Such tests may be obtained through your healthcare provider or at a testing center.
- “Deferral” refers to an approved deferral of vaccination based on a pregnancy-related medical condition, including breastfeeding. Pregnancy Deferral will extend throughout the term of the pregnancy and until twenty-four months after childbirth, as applicable.
- “Disability” refers to a physical or mental impairment, disorder or condition that substantially limits a major life activity and any other condition recognized as a disability under applicable law, including but not limited to the Americans with Disabilities Act of 1990, as amended (“ADA”) and the Rehabilitation Act of 1973. “Disability,” for purposes of this policy, includes pregnancy-related medical conditions where reasonable accommodation is medically advisable. Current illegal drug use is expressly excluded from this definition of “disability.”
- “Exception” refers to an approved exception to COVID-19 vaccination based on a Medical Exemption, Disability, or Religious Objection. For purposes of this policy, a person who is pregnant or breastfeeding is not eligible on that basis alone for an Exception but could be eligible for a Deferral



for the duration of pregnancy and until twenty-four months after childbirth, as applicable.

- “Vaccinated” or “completed vaccination” for purposes of this policy refers to completion of a COVID-19 vaccination series authorized or approved by the U.S. Food and Drug Administration (“FDA”), or completion of a COVID-19 vaccination series pre-qualified or approved for Emergency Use Listing by the World Health Organization (“WHO”).
- “Medical Exemption” refers to an excuse from receiving COVID-19 vaccine due to a medical contraindication or precaution, disability, or medical impairment, disorder, or condition.
- “Reasonable Accommodation,” for purposes of this policy and procedure, refers to an adjustment made to the requirements of the COVID-19 Vaccination Program for an individual who has received an approved Exception or Deferral.
- “Religious Objection” refers to an applicant or employee’s objection to receiving the COVID-19 vaccine based on that person’s sincerely held religious belief, practice, or observance.
- “Unvaccinated,” for the purposes of this policy, refers to a person who has not completed a COVID-19 vaccination series, including any employee or applicant whose vaccination status is not known. For the purposes of this policy and procedure, an employee is considered unvaccinated if they have not received any dose of a single dose vaccine or the first dose in a multi-dose vaccine.
- “Vaccine,” for purposes of this policy and procedure, refers to a vaccine intended to provide acquired immunity against severe acute respiratory syndrome coronavirus 2 (SARSCoV2), the virus that causes coronavirus disease 2019 (COVID19). A COVID-19 vaccine satisfies the requirements of this policy and procedure if: (i) the U.S. Food and Drug Administration (FDA) has issued a License or an Emergency Use Authorization (EUA) for the vaccine or (ii) the World Health Organization has pre-qualified or approved Emergency Use Listing (EUL) for the vaccine.

V. COVID-19 Vaccination Program

As a condition of employment (as staff or assignment-driven employee) with Happy Faces Personnel, unless otherwise not permitted by law, all staff and employees must participate in the COVID-19 Vaccination Program by 1) providing proof of vaccination via the confidential form at <https://www.hfpersonnel.com/covidform> or 2) submitting to weekly testing for the detection of COVID-19 and providing those results via the confidential form at <https://www.hfpersonnel.com/covidform>. An



employee may be excused from this condition of employment by filing for exemption with Happy Faces Human Resources (supporting documentation may be requested).

VI. COVID-19 Vaccination

Staff and employees who have not previously provided proof of completed vaccination to Happy Faces, must establish that they are vaccinated by uploading a copy of their CDC vaccination card or an official medical record via the Happy Faces website at <https://www.hfpersonnel.com/covidform> on or before September 27, 2021 unless they have an approved exemption that excuses them from this completed vaccination requirement. Staff and employees hired on or after September 27, 2021 will be required to provide proof of completed vaccination or request an exemption that excuses them from the completed vaccination requirement no later than three (3) days prior to the candidate's start date. The process for requesting an exemption is set forth in Section III below. Happy Faces may, based on guidelines from the CDC or any federal, state, or local public health agency, also require vaccinated employees to submit proof of booster dose(s) unless exempted. Vaccinated staff and employees will receive advance notice of such requirement and instructions on how to submit proof of compliance. Proof of completed vaccination may be subject to audit. Any falsification of vaccine information will result in termination of employment. Staff and employees are not required to disclose and should not disclose genetic information or other medical information when verifying vaccination status.

VII. COVID-19 Testing Alternative

After September 27, 2021, staff and employees who have not provided proof of completed vaccination, including employees with an exemption that excuses them from the completed vaccination, must submit to weekly COVID-19 testing unless they have an approved reasonable accommodation that excuses them from this COVID-19 testing requirement based on an exception or deferral request.

Staff and employees hired on or after September 27, 2021, who will not provide proof of completed vaccination, if applicable, as required in Section A above, must submit acceptable proof of having taken a COVID-19 test within three (3) days of submission or request an exemption that excuses them from this COVID-19 testing requirement no later than three (3) days prior to the candidate's start date. The process for requesting an exemption is set forth in Section III below. To satisfy the COVID-19 testing requirement, employees must undergo COVID-19 testing at minimum once each calendar week. On the first workday in a calendar week, staff and employees must submit acceptable proof of having taken a COVID-19 test within three (3) days of uploading the proof to <https://www.hfpersonnel.com/covidform>.



Staff and employees who receive a positive COVID-19 test result during their weekly testing must inform Happy Faces Human Resources and follow the COVID-19 Positive Results and Isolation Protocol in section XI below. Proof of COVID-19 testing may be subject to audit. Any falsification of COVID-19 testing information will result in termination of employment. Employees are not required to disclose and should not disclose genetic information or other medical information when verifying COVID-19 testing. If an employee is on leave during an entire calendar week, the employee is not required to submit proof of COVID-19 testing during that week.

VIII. Request for Vaccine Exemption

For an exception from the completed vaccination requirement and/or the COVID-19 testing requirement based on a medical exemption, disability, or religious objection or for a deferral of the completed vaccination requirement, employees are required to submit a request to Happy Faces Human Resources via HR@happyfaces.net. Staff and employees are encouraged to submit their requests as soon as possible. Staff and employees may seek workplace accommodation without fear of retaliation. You may be required to substantiate any such conditions or beliefs by providing appropriate documentation from a doctor or religious official. Happy Faces will review requests on a case-by-case in line with the Americans with Disabilities Act - Reasonable Accommodation Policy and Procedure (No. 100-16) or the Religious Accommodations Policy and Procedure (No. 109-16), whichever is applicable. Safety protocols will be required or recommended, as appropriate, for those who are granted a reasonable accommodation based on an exception or deferral request.

IX. Non-Discrimination/ Non-Retaliation

Happy Faces Personnel is an equal opportunity employer and is committed to the principles of non-discrimination and equality of employment opportunities. Happy Faces does not discriminate against applicants, employees, or staff regarding race, color, religion, sex (including pregnancy, sexual orientation, gender identity or expression), national origin, age, disability, and genetic information (including family medical history), or any other characteristic protected by applicable federal, state, or local law. Happy Faces also accommodates disabilities and sincerely held religious beliefs, practices or observances to the extent required by law and prohibits retaliation for any conduct protected by applicable law. Although an exemption request may be denied if it is unreasonable or poses an undue burden and/or presents a direct threat to the health and safety of others, Happy Faces will not retaliate against any employee or applicant merely for requesting an accommodation.



X. Confidentiality

Happy Faces will keep all individuals' vaccination status, underlying medical condition(s), supporting documentation, and COVID-19 test results confidential.

XI. Compliance

Assessment of employee compliance will begin October 3, 2021, and continue weekly thereafter. Employees will be subject to the following discipline for failure to comply with this Policy and Procedure: (1) First offense: warning (2) Second offense: 1 day suspension w/o pay (3) Third offense: 3 days suspension w/o pay (4) Fourth offense: Termination of assignment. Suspension(s) need not occur in the same week as the employee's lack of compliance, and multiple suspensions may be served consecutively with other suspensions and/or immediately preceding dismissal. An offer of employment may be rescinded for candidates who fail to timely submit proof of completed vaccination or COVID-19 testing or fail to timely request an exemption from both requirements.

XII. Paid Time Off (PTO) for COVID-19 Vaccination and Testing

Up until September 27th, every employee shall be provided paid time off in the form of two (2) hours of administrative leave per vaccine injection, to receive vaccination for COVID-19. Employees who were vaccinated prior to the effective date of this policy will be credited four (4) hours of administrative leave. Employees who experience adverse side effects within twenty-four (24) hours of receiving a vaccine injection may request up to a total of forty (40) hours of administrative leave to be utilized on the days immediately following a vaccine injection or booster dose.

Administrative leave may be offered for purposes of taking a COVID-19 test. Employees may also use personal time outside of the administrative leave offered at their own expense. The entire period of time off granted pursuant to this section shall be provided at the employee's regular rate of pay and shall not be charged against any other accrued leave category, including sick leave. This offer of administrative leave is provided voluntarily by Happy Faces and is dependent on proper documentation. Proper documentation includes COVID-related time off request documented (detailed PTO form), the results documented (test results before and after quarantine) and HR approval documented



HAPPY FACES
FAMILY OF COMPANIES

XIII. Positive Results and Isolation

If you:

- Test positive without symptoms: isolate for 10 days after date of test.
- Test positive with symptoms: Isolate for 10 days after initial appearance of symptoms, after you have been fever-free for 24 hours
- If you have symptoms of COVID-19, you will be sent home immediately if at work. You must get tested and isolate for 10 days as above if results are positive.
- Are fully vaccinated and have been exposed you may report to work but must get tested 3-5 days following exposure and adhere to protocol above.
- Are not (yet) fully vaccinated and have been exposed, isolate, and get tested on the 10th day of quarantine and follow protocol above.
- Staff and employees are required to retest before returning to work and confirm negative results via a PCR/NAAT COVID-19 test.