

## COVID-19 Vaccination and Testing Requirements for LMH Employees

<b>PURPOSE AND SCOPE</b>	The purpose of this policy is to define the expectations and standard operating procedures regarding COVID-19 vaccination and testing requirements for LMH employees.
<b>APPLIES TO</b>	All LMH employees
<b>RESPONSIBILITIES</b>	This policy was written by the Chief Operating Officer. It is for application across all LMH offices and geographies.
<b>REVIEW PROCESS</b>	The policy will be reviewed at 6 months intervals.
<b>CURRENT VERSION</b>	Version 1.0
<b>EFFECTIVE DATE OF CURRENT VERSION</b>	01 March 2022

Version #	Date	Author	Reason for a new version
1.0	March 2022	Nathan Hutto (COO)	First Draft

### 1. Introduction

Our work to prevent the spread of COVID-19 and ensure continuity of essential health services in remote communities remains essential during the COVID-19 pandemic. A COVID-19 vaccine (“vaccine”), along with other protective measures, is a critical tool to enable the Last Mile Health (“LMH”) community to assist our government and community partners, while also remaining healthy ourselves.

Therefore, we are requiring LMH staff to be fully vaccinated against COVID-19 wherever legally allowable and are instituting COVID-19 vaccination requirements to perform core work activities in all locations. Please note that this policy will impact staff differently based on their geography and the national COVID-19 policies that have been rolled out in their respective countries.

Ensuring full vaccination among our employees will accrue numerous benefits, including:

- Keeping our employees safe and decreasing the likelihood of severe illness or death from COVID-19.
- Reducing the risk of employees contracting COVID-19 and spreading the virus to colleagues and beneficiaries, within program communities or partner networks.

- Modeling policies, practices, and behaviors to which we are committed as an organization within our values.
- Increasing team morale, cohesion, and effectiveness by enabling more in-person gatherings.
- Reducing catastrophic medical care costs for LMH, LMH employees, and families.
- Enabling business continuity, including stabilizing travel policies, reducing absences, and guaranteeing program implementation.

With these goals in mind, LMH has developed policies regarding COVID-19 vaccination among its employees, including general vaccination requirements for employees and vaccination requirements for specific work activities.

These policies have been developed with expertise from LMH's people operations, safety and security, and medical functions, and have undergone legal review from outside counsel with expertise in labor, health, and safety laws in the countries in which we operate. LMH reserves the right to modify these policies and will communicate all changes to employees in a timely manner.

Regardless of the LMH employment policies governing your place of employment, we request that all LMH employees receive and maintain full vaccination against the COVID-19 virus.

## 2. Definition of “fully vaccinated” against COVID-19

2.1. Because the evidence and policy environment for COVID-19 is regularly changing, the definition of the concept “fully vaccinated” will change. Additionally, vaccines have varying levels of efficacy against the virus, with frequently evolving evidence on the interactions between vaccines and the COVID-19 virus. Governments, norming bodies, and employers have taken a constellation of approaches to managing this issue.

2.2. LMH encourages employees to receive vaccines with the highest efficacy whenever possible.

2.3. For the purposes of this policy, the term “fully vaccinated” is defined as completion of a primary vaccine series, with a booster dose approximately 6 months (2 months for Johnson & Johnson) following as permitted and in line with the country's guidelines/policy. The primary vaccines series is a course of 2 doses within a 12 week period<sup>1</sup> for all vaccines except Johnson & Johnson, which requires only one dose.

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<sup>1</sup> Recommendations are 3 weeks between 2 doses of Pfizer, 4 weeks between Moderna doses and 8-12 weeks for Astrazeneca. For primary series vaccination, LMH will accept within 6 weeks for Moderna and Pfizer and up to 12 weeks for Astrazeneca.

### **3. Vaccination requirements by LMH country of operation**

3.1. LMH will require its employees to be fully vaccinated as allowable under local and federal law in the country in which they work.

3.2. According local and federal law at the date this policy was last updated:

3.2.1. **Ethiopia.** Current employees based in Ethiopia are not required to be vaccinated against COVID-19.

3.2.2. **Ghana.** Current employees based in Ghana are not required to be vaccinated against COVID-19.

3.2.3. **Liberia.** All current and future employees based in Liberia are required to be fully vaccinated against COVID-19.

3.2.4. **Malawi.** All current and future employees based in Malawi are required to be fully vaccinated against COVID-19.

3.2.5. **Sierra Leone.** Current employees based in Sierra Leone are not required to be vaccinated against COVID-19. All future employees will be required to be fully vaccinated and all current employees will be required to be fully vaccinated under any renewed employment contracts.

3.2.6. **Uganda.** Current employees based in Uganda are not required to be vaccinated against COVID-19.

3.2.7. **United States.** All current and future employees based in the United States are required to be fully vaccinated against COVID-19.

3.3. When local and federal law permit employer-required vaccination against COVID-19 in countries where vaccination is not currently permitted, LMH will opportunistically expand requirements into those geographies.

3.4. See Appendix A for a tabular summary of these requirements.

### **4. Operational vaccine requirements for all employees**

4.1. Regardless of location, all LMH employees will be required to be fully vaccinated against COVID-19 to engage in the following work activities:

4.1.1. **Enter any LMH work site.** “Work site” is defined as any permanent or temporary location or facility where LMH employees are gathered to conduct official business, including all office and work spaces whether or not those spaces are directly managed by LMH.

4.1.2. **Travel.** “Travel” is defined as any travel outside of an employee’s primary, day-to-day work location and includes both domestic and international travel.

4.1.3. **Use of any LMH vehicle.** This applies to employees driving or riding in any LMH vehicle, including motorbikes.

4.2 Employees who are not fully vaccinated will not be permitted to enter an LMH worksite, travel, or use LMH vehicles.

4.3. Current employees required to enter an LMH work site, travel, or use an LMH vehicle due to the requirements of their role and are not permitted to do so due to their vaccination status may have their duties reassigned, with job title and compensation adjustments made accordingly.

4.4. All new employees in all locations who are required to enter an LMH work site, travel, or use an LMH vehicle due to the requirements of their roles will be required to be fully vaccinated.

4.5. See Appendix A for a tabular summary of these requirements.

## 5. COVID-19 testing requirements

5.1. All employees based in countries where a general vaccination requirement is not in place and who choose to not be fully vaccinated will be required to submit results of a COVID-19 laboratory test weekly.

5.2. This test must be a laboratory antigen or PCR test.

5.3. Employees will be required to pay for and facilitate their own testing.

5.4. Unvaccinated, tested employees are still barred from LMH worksites, travel, and vehicles.

5.4. See Appendix A for a tabular summary of these requirements.

## 6. Exemptions to vaccination and testing requirements

6.1. **Vaccine or testing availability.** An employee will be temporarily exempted from this policy if appropriate vaccines or tests are not readily available in the locale where the employee resides or works.

6.2. **Religious exemptions.** An employee may be granted an exemption from this policy if they can demonstrate that the policy conflicts with sincerely held religious beliefs and that the exemption or accommodation does not create an undue hardship on LMH or its employees.

6.3. **Medical or disability exemptions.** An employee may be granted an exemption from this policy if they can demonstrate that the policy poses a medical risk and that any exemption or accommodation does not create an undue hardship on LMH or its employees.

6.4. **Philosophical beliefs or personal preferences.** No exemptions to this policy will be made due to an employee's philosophical beliefs or personal preferences.

6.5. In all requests for exemptions, review of requests and decisions will be made on a case-by-case basis by People Operations, in consultation with appropriate advisors. Decisions regarding requests for exemptions will be made following guidance and regulations from the U.S. Equal Employment Opportunity Commission, Americans with Disabilities Act, and Title VII of the Civil Rights Act, with attention paid to legal and regulatory requirements of locales outside of the U.S.

6.6. All requests for accommodations and exemptions will be kept confidential. Only People Operations will have access to requests for accommodations and exemptions and only People Operations and line managers will have access to approved accommodations and exemptions.

## 7. Employee compliance

7.1. All employees are expected to comply with these policies.

7.2. All employees will be required to attest via signature that they are in compliance with the policy as defined for the country in which they work and that they will submit valid copies of vaccination records if asked.

7.3. All employees will be allowed to submit proof of vaccination to LMH for purposes of record keeping.

7.4. LMH will conduct both targeted and random audits of employee compliance with this policy. This may include requests for vaccination records to confirm employee compliance with relevant policies.

7.5. Failure to comply with these policies may result in termination of employment, in accordance with local labor laws and LMH employment policies.

7.6. Failure to truthfully complete required documentation may result in termination of employment, in accordance with local labor laws and LMH employment policies.

## **8. Employer responsibilities**

8.1. LMH will communicate this policy transparently with all employees and consider employee input. LMH will communicate any changes to this policy to employees in a timely manner and allow appropriate time for employees to comply.

8.2. LMH will provide employees with appropriate training on the policies and relevant procedures.

8.3. Within reason, LMH will support employees to become compliant with the expectations of the policy if they are not in compliance.

## **9. Effective date**

9.1. All policies described herein will be effective as of 01 March 2022.

9.2. All employees must attest to their compliance with these policies by 24 May 2022.

**Appendix A. Summary of COVID-19 vaccination and testing requirements, by country**

<b>Country</b>	<b>COVID-19 vaccine required</b>	<b>Testing requirements for unvaccinated employees</b>	<b>Access to LMH assets for unvaccinated employees</b>
Ethiopia	No	Weekly laboratory testing paid by employees	Restricted from work sites, vehicles, and travel; duties and roles re-assigned as appropriate.
Ghana	No	Weekly laboratory testing paid by employees	Restricted from work sites, vehicles, and travel; duties and roles re-assigned as appropriate.
Liberia	Yes	N/A	N/A
Malawi	Yes	N/A	N/A
Sierra Leone	No	Weekly laboratory testing paid by employees	Restricted from work sites, vehicles, and travel; duties and roles re-assigned as appropriate.
Uganda	No	Weekly laboratory testing paid by employees	Restricted from work sites, vehicles, and travel; duties and roles re-assigned as appropriate.
United States	Yes	N/A	N/A

## COVID-19 Vaccination and Testing Requirements for LMH Employees *Employee Attestation of Compliance*

This document serves to confirm employee understanding and compliance with Last Mile Health's COVID-19 vaccination and testing requirements.

All Last Mile Health employees are required to review and complete this document in order to be fully in compliance with this policy. Refusal to acknowledge or sign this policy may result in employment action.

### **Employee to complete the remainder of this document**

I, \_\_\_\_\_, a / an \_\_\_\_\_ based employee,  
[Employee Name] [Country]  
attest that:

- I have read Last Mile Health's policy regarding COVID-19 vaccination and testing requirements for LMH employees.
- I have read and understand the policies that apply to the country in which I work.
- I affirm that I am in full compliance with this policy, as it relates to the country in which I work.
- I agree to be subject to audits of my compliance with this policy, including providing evidence to Last Mile Health People Operations or their designee of my COVID-19 vaccination status.
- I understand that my employment may be terminated if I refuse to comply with this policy, refuse to sign this document, falsify my compliance with this policy, or am otherwise found to be out of compliance with this policy.

My signature below indicates my agreement with the above statement.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

If you **do not intend to comply** with this policy, please indicate as such below.

- I intend to request a medical or religious exemption to this policy.
- I do not intend to comply with this policy for a different reason.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

***If providing a non-digital signature, please remove this attestation and deliver it to your People Operations team as soon as possible.***