

# COVID-19 Vaccination Policy (Supplier)

## 1. PURPOSE

Aveo is committed to providing a workplace that supports zero harm to the health and safety of all workers, residents, visitors, suppliers, contractors and members of the public.

This policy aims to assist in safeguarding the health of Aveo Workers, Suppliers and others at the workplace, so far as reasonably practicable, by managing the serious safety risks and potentially significant adverse health impacts associated with COVID-19.

## 2. SCOPE

This policy applies to all Suppliers and workplaces of Aveo Group.

Commonwealth, State and Territory legislative requirements apply to the extent of any inconsistency with this policy. However, for the avoidance of doubt, where this policy imposes more onerous restrictions on Suppliers, this policy will apply.

This policy should be read in conjunction with *COVID-19 Vaccination Policy - Residential Aged Care (ACG\_RAC-P002)*, which sets out the requirements in place to meet all mandatory vaccination obligations for residential aged care Suppliers.

## 3. DEFINITIONS

|                                     |  |
|-------------------------------------|--|
| ATAGI                               | means the Australian Technical Advisory Group on Immunisation.   |
| COVID-19                            | is taken to mean severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2), also known as “2019-nCoV”; “2019 novel coronavirus”; “COVID-19”; “COVID-19 virus”; “coronavirus disease”; “COVID”.  |
| COVID-19 vaccination                | COVID-19 vaccine approved by the Therapeutic Goods Administration (TGA) for use in Australia, or where a person has been vaccinated overseas, a World Health Organisation-COVAX approved and TGA recognised COVID-19 vaccine.            |
| Current COVID-19 Vaccination Status | means evidence that an individual has received an initial COVID-19 vaccination, and any subsequent COVID-19 vaccination or booster that are required or recommended by ATAGI.  |
| Entry requirement                   | means a condition of entry to Aveo workplaces whereby Suppliers are required to provide evidence of their Current COVID-19 Vaccination Status prior to commencing any work or entering the premises.                                     |
| Suppliers                           | means any supplier (including their employees and subcontractors) performing work at any Aveo workplace.   |
| Worker                              | means any worker, including employees, contractors (and employees of contractors), subcontractors, medical practitioners, nurses, carers, emergency services staff, volunteers and work experience students, carrying our work for Aveo. |

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## 4. POLICY

Aveo is committed to safeguarding the health, wellbeing and safety of its residents, Workers and Suppliers, and in preventing/limiting the spread of communicable diseases such as COVID-19. As an employer, Aveo has a duty to ensure its Workers and those we conduct business with, are safe, as far as reasonably practicable.

Requiring COVID-19 vaccination of our Suppliers is a high order control measure to manage the risk of COVID-19 in Aveo's workplaces and retirement communities. Aveo will ensure that additional controls, such as mask wearing, physical distancing, cleaning and good hand and respiratory hygiene continue to be implemented contemporaneously with this policy, where appropriate.

COVID-19 vaccinations are an effective way of reducing the risk of spreading COVID-19 between workers, suppliers, residents and the community at large. COVID-19 vaccinations can also reduce the severity of the impact that COVID-19 has on people if they contract the virus.

This risk-based policy has been developed in consultation with Workers and residents to not only comply with government legislative vaccination requirements, but also to ensure the health and safety of Aveo workers, suppliers, residents and the surrounding communities.

As such, Aveo requires all Suppliers entering its workplaces to have received the COVID-19 Vaccination and to provide evidence of their Current COVID-19 Vaccination Status, unless expressly agreed with us, as a condition of entry to Aveo workplaces.

## 5. EVIDENCE OF VACCINATION STATUS FOR ALL SUPPLIERS

All Suppliers will be asked to provide evidence of their Current COVID-19 Vaccination Status prior to entry to an Aveo workplace as a condition of entry (Entry Requirement).

Aveo operates a 'Show and Go' system in providing/sighting vaccination evidence, whereby Suppliers will be required to furnish evidence of Current COVID-19 Vaccination Status to front of house/reception staff at each Aveo community or workplace prior to entry.

COVID-19 vaccination evidence can include:

- a COVID-19 vaccination certificate or COVID-19 digital certificate from Services Australia;
- an immunisation history statement which can be accessed from Medicare online or theExpress Plus Medicare mobile app;
- a statement of vaccination history from the Australian Immunisation Register.

If a Supplier is not willing or able to provide evidence of their Current COVID-19 Vaccination Status as part of the Entry Requirement, that Supplier will not be permitted entry to any Aveo workplace.

Aveo will assume that a Supplier does not have Current COVID-19 Vaccination Status until shown otherwise.

## 6. TEMPORARY EXEMPTIONS

In certain extenuating circumstances, such as in emergencies or for critical maintenance matters that carry significant health and safety implications requiring immediate rectification, a Supplier may be permitted to enter an Aveo workplace where they do not meet or are unable to furnish evidence of Current COVID-19 Vaccination Status. This must be expressly agreed between Aveo and the Supplier prior to entry and will be on a case-by-case basis. Any exemption will be temporary and will expire on completion of said work.

Where a Supplier's exemption is temporarily granted, Aveo may consider implementing additional safety measures or suitable alternative controls to lower the risk of COVID-19

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infection and transmission as far as reasonably practicable in the circumstances.

This may include additional personal protective equipment, such as N95 face masks and face shields, and/or undergoing a COVID-19 PCR nasopharyngeal surveillance test or a COVID-19 Rapid Antigen Test at the Supplier's expense.

## 7. FAILURE TO COMPLY WITH VACCINATION REQUIREMENT

In the absence of an approved exemption, failure to comply with the Entry Requirement in this policy will result in the Supplier being refused entry to all Aveo workplaces and may have consequences on Aveo's engagement with the Supplier under the supply terms and conditions.

## 8. BOOSTER VACCINATION

It is anticipated that booster COVID-19 Vaccinations will be required from time to time, as recommended by the Australian Technical Advisory Group on Immunisation or other recognised Health Authority.

The same arrangements that apply to initial vaccinations as set out in this policy will apply in respect of boosters, including in respect of failure to comply with the requirement to obtain the booster vaccination.

## 9. CONFIDENTIALITY AND PRIVACY

Information regarding a Supplier's health, including Current COVID-19 Vaccination Status, is and will be treated confidentially and handled in line with applicable laws.

Aveo's 'Show and Go' strategy does not require Workers to collect physical evidence of COVID-19 vaccination from Suppliers, merely to sight it. Notwithstanding, in circumstances where Supplier vaccination status information is collected, used and disclosed by Aveo for the purpose of implementing this policy, for meeting record keeping and reporting obligations conferred on it under law, and for workplace safety and public health purposes, said information will be handled in line with applicable laws and Aveo's Privacy Policy, which is available online or on request.

Vaccination information will be securely stored and kept confidential by Aveo and will only be accessible to third parties where record keeping and reporting obligations require it.

## 10. CHANGES TO POLICY

Aveo will continue to monitor the latest developments in respect of COVID-19 Vaccination. Aveo will continue to follow guidance from the Commonwealth and State or Territory Governments for the jurisdictions we operate in.

This policy may be updated to reflect any changes in that guidance.

## 11. POINTS OF CONTACT

Suppliers should direct any questions regarding this policy to the National Procurement Manager.

This Policy was approved by the Chief Executive Officer and Chief Risk Officer on 29 October 2021.