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CYCLING CANADA NATIONAL TEAM MANDATORY COVID-19 VACCINATION POLICY

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PURPOSE

At Cycling Canada, we are committed to providing and maintaining a safe and healthy environment for all. Consistent with this commitment, Cycling Canada has established this Mandatory COVID-19 Vaccination Policy (the “**Policy**”). The Policy requires that, in accordance with the terms set forth below, all persons subject to this Policy (as defined in Scope, below) be fully vaccinated for COVID-19 or obtain an approved accommodation or exemption.

BACKGROUND

Cycling Canada has legal obligations to take *every precaution reasonable in the circumstances* to protect the health and safety of a worker and its stakeholders. The objective underlying this Policy is to provide a healthy and safe environment for employees, contractors, coaches, athletes, support staff and customers, and safeguard the broader communities in which they live.

SCOPE

This Policy applies to all Cycling Canada National Team staff, contractors, coaches, athletes, support staff, and volunteers (collectively “National Team Stakeholders”) who may be attending training or competition projects organized by Cycling Canada, who will be present at National Team facilities (workshops, labs, offices, etc.) or who, as a result of their commitments to Cycling Canada, will be in proximity to National Team athletes (collectively “National Team Environment”). A National Team Stakeholder is considered to be in the National Team Environment as soon as they begin any required travel to get there.

This policy is intended to supplement any provincial or regional requirements that may be in place and does not replace them.

TIMING

With immediate effect, all National Team Stakeholders must be fully vaccinated at least **two weeks (14 days)** prior joining the National Team Environment. “Fully vaccinated” includes both doses of a Health

Canada approved vaccine, where applicable. It is the responsibility of the National Team Stakeholder to ensure they have received their second dose early enough to join the National Team environment. Cycling Canada staff and athletes who fail to comply with the terms set out in this Policy may be subject to disciplinary action, up to and including termination of their employment contract, termination of their National Team Contract, or removal from the National Team Environment.

There is not currently a requirement to have a third vaccine (booster shot) but National Team Stakeholders are strongly encouraged to get one when available.

PROOF OF VACCINATION

Once a National Team Stakeholder has been fully vaccinated, they are required to provide Cycling Canada with the dates of their vaccinations, the type(s) of vaccine, the place the doses were administered, and the health authority that was responsible for administering and recording the doses. This information must be provided using [this online form](#) 14 days prior to first joining the National Team Environment.

When joining the National Team Environment, National Team Stakeholders will be asked by a designated Cycling Canada staff member to show proof of vaccination, or a letter from a medical practitioner confirming the National Team Stakeholder has been vaccinated. Cycling Canada will record that the proof of vaccination has been verified, but will not collect the proof itself. Cycling Canada reserves the right to request to see the proof again at a future date.

It is the National Team Stakeholder's responsibility to ensure they can provide the relevant documentation. Cycling Canada reserves the right to request additional information at its discretion.

Cycling Canada will only collect, use and disclose information regarding a National Team Stakeholder's vaccination status in accordance with its Privacy Policy and all applicable privacy laws.

EXEMPTIONS

Cycling Canada recognizes its responsibilities and duties under provincial human rights legislation, such as the Ontario *Human Rights Code* (the "Code"). If a National Team Stakeholder is unable to be vaccinated, due to a protected ground, as defined by the Code, Cycling Canada has a duty to accommodate to a point of undue hardship.

However, this duty to accommodate must be balanced against Cycling Canada's obligations to protect the health and safety of National Team Stakeholders. Due to the serious health threat COVID-19 presents to the public, if a National Team Stakeholder will not be vaccinated because of a protected ground under the Code, they must request an accommodation or exemption which falls under one of the following two categories:

- 1) Medical Condition, or;
- 2) Religious / Creed.

Medical Condition Exemption

A National Team Stakeholder who is requesting an exemption from this Policy on the basis of a medical condition must provide Cycling Canada with a letter from a medical doctor, clearly stating the reason why the stakeholder should be exempted from receiving the vaccine. This letter will be considered information in the consideration of the exemption and does not constitute, in and of itself, an exemption.

Religious/Creed Exemption

The Ontario Human Rights Tribunal defines religion as “the practices, beliefs and observances that are part of a faith or religion. It does **not** include personal moral, ethical or political views”.

There is no requirement under the Code to accommodate a bald refusal to be vaccinated arising from a political belief and/or principle. Political belief, such as the objection to receiving the vaccination on a principled basis, is not a protected ground under the Code.

A National Team Stakeholder may apply for an exemption, due to religious belief or creed. Cycling Canada reserves the right to ask for materials in support of National Team Stakeholder's religious belief or creed, including a letter of support from a religious leader or community. This letter will be considered information in the consideration of the exemption and does not constitute, in and of itself, an exemption.

Process to Receive an Accommodation

- 1) The National Team Stakeholder who seeks an accommodation, including an exemption, is required to submit a COVID-19 Vaccination Accommodation/Exemption Request to Cycling Canada's High Performance Director at kris.westwood@cyclingcanada.ca, with supporting documentation.
- 2) The **High Performance Director** will consult with a committee of subject matter experts as deemed necessary to determine whether the accommodation, including an exemption, will be granted based on the accommodation process set out below. If additional information is required from the National Team Stakeholder, the **High Performance Director** will follow up.
- 3) The **High Performance Director** will confirm receipt of the Accommodation/Exemption Request. An original copy of the request email will be securely stored at Cycling Canada.

The accommodation process is a shared responsibility. All parties should cooperatively engage in the process, share information, and consider potential accommodation solutions. National Team Stakeholders who are requesting an accommodation are required to:

- 1) Make the accommodation needs known to the best of their ability, preferably in writing, in a timely manner;
- 2) Answer reasonable questions or provide information about relevant restrictions or limitations, including information from health care professionals;
- 3) Take part in discussions about possible accommodation solutions;
- 4) Co-operate with any experts whose assistance is required to manage the accommodation process;
- 5) Meet agreed-upon standards and requirements, once accommodation is provided; and
- 6) Work with Cycling Canada administration on an ongoing basis to manage the accommodation process.