

Curro Staff

MANDATORY VACCINATION PROCESS



CURRO

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10 JANUARY 2022 – COMMUNICATION TO EMPLOYEES ARRIVING AT SCHOOL

Curro decided early in October 2021 that it would become a mandatory vaccination company and that all employees would be required to vaccinate against the COVID-19 virus. Numerous articles, publications and circulars were distributed through various communication platforms encouraging employees to vaccinate.

The government, society, scientists and many more continuously advocate the positive effects of being vaccinated and the effect it will have on limiting the spread of the virus as well as the lesser effects it will have on individuals contracting the virus. It has also been widely published that the number of persons experiencing adverse effects are negligible and, in most cases, where adverse reactions have been experienced it was found that the persons suffered some underlying conditions.

Curro approached the engagement of mandatory vaccinations cautiously and did not merely announce a blanket – everyone must be vaccinated on the same day approach. Curro had several meetings with the South African Human Rights Commission, obtaining guidelines and direction in ensuring the process is fair and appropriate. We accept that some persons may claim that they have certain medical conditions, religious objections and that it infringes their constitutional rights. To cater for the above scenarios, Curro created an exemption application mechanism that will address these applications. Each forum will consist of senior Curro management and is supported by specialists such as medical doctors, lawyers/advocates, and religious leaders.

We know some teachers and staff had already commenced their annual leave at the time when the policy on mandatory vaccination was released and therefore did not have sufficient time to study the content.

The January 2022 starter pack with all the relevant documentation is in addition available to staff from 10 January 2022.

- Staff will be granted the week from 10 January 2022 to obtain a PCR test before reporting for duty on 17 January 2022 if they have not been vaccinated for any reason whatsoever.
- Failure to provide the test results on 17 January 2022 will require Curro to engage in the process of taking the appropriate steps.

Employees must please ensure that their vaccination status and details are submitted and updated to ensure proper record-keeping.

We trust that the documentation handed to you today will assist you in dealing with Curro's view and decision to ensure a safer workplace for you, your colleagues, family and broader society. Vaccinate and let's beat the virus that has destroyed so many dear and important aspects of our lives. Support the resumption of economic activity and prosperity for all.

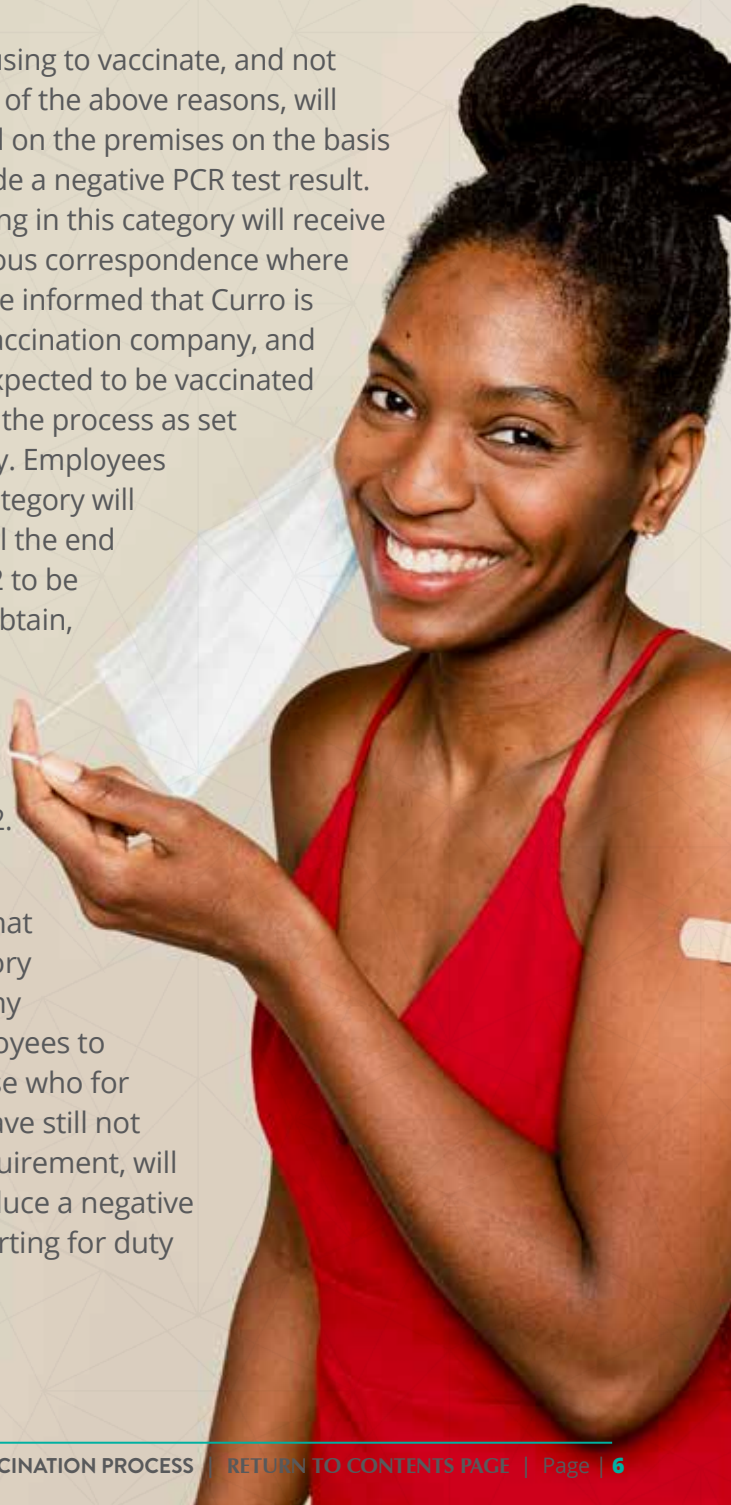
The Curro management team

REQUIREMENTS FOR ENTERING ANY CURRO PREMISES

1. Employees entering the premises of any Curro facility will have to submit proof of the following documentation:
 - 1.1. A valid vaccination certificate indicating which vaccination was received, the number of doses that were administered and the date on which the vaccination was administered. Only official certificates will be acceptable.
 - 1.2. PCR test results not older than 72 hours before 10 January 2022 reflecting a negative test.
 - 1.3. A doctor's certificate indicating that you have a medical condition that requires that you should not be vaccinated. The employees will then still be required to produce a negative test result. Medical certificates will only be valid during the period until an exemption form has been submitted and assessed by the medical panel. The decision of the medical panel will then be binding.
 - 1.4. A certificate from the highest authority of the religious belief in South Africa indicating the religious grounds for the refusal to vaccinate must be submitted on an official letterhead. The individual will still be required to produce a negative test result upon entering the premises. Religious objection certificates will only be valid during the period until an exemption form has been submitted and assessed by the religious panel. The decision of the religious panel will then be binding.
 - 1.5. A sworn statement by the individual must reflect the exact grounds in terms of specific clauses of the constitution on which the individual chooses to appeal the instruction to vaccinate. Arguments must be valid and based on a legal basis. The individual will still be required to produce a negative test result upon entering the premises. Constitutional grounds objection certificates will only be valid during the period until an exemption form has been submitted and assessed by the legal panel. The decision of the legal panel will then be binding.

1.6. Employees refusing to vaccinate, and not covered by any of the above reasons, will only be allowed on the premises on the basis that they provide a negative PCR test result. Employees falling in this category will receive copies of previous correspondence where employees were informed that Curro is a mandatory vaccination company, and that they are expected to be vaccinated or form part of the process as set out in the policy. Employees falling in this category will be allowed until the end of January 2022 to be vaccinated or obtain, as a temporary measure, a negative test before 17 January 2022.

The fundamental principle remains that Curro as a mandatory vaccination company expects all its employees to be vaccinated. Those who for whatever reason have still not adhered to this requirement, will be required to produce a negative PCR test upon reporting for duty as set out above.



FREQUENTLY
ASKED
QUESTIONS

EXEMPTION TASK TEAMS

1. To allow for a fair and transparent process in the exemption applications, Curro decided to appoint teams comprising Curro management and specialists in the specific areas. The composition of the panel may change from time to time depending on the availability of the specialists but will always include at least two specialists and members of the Curro management team.
2. The purpose of the respective panels is to evaluate and study each individual application in terms of the appropriate application of specific science, legal argument, or religious beliefs. For the panel to evaluate each case on merit and appropriately, it is essential that all information related to the medical condition, legal standing or religious objection is submitted. Comprehensive reports from authoritative persons will contribute to the quick assessment and conclusion of applications. Where insignificant or frivolous applications without proper justification are received, the panel will make a ruling which will be binding.
3. The following specialist panels will be established:
 - 3.1. The medical panel will comprise two members nominated by Curro and two external medical specialists.
 - 3.2. The legal panel will comprise two members nominated by Curro and two external legal advisors.
 - 3.3. The religious panel will comprise two members nominated by Curro and two external religious advisors.
4. The recommendation of the panel will be communicated to Curro's senior management who will in turn advise the employee of the outcome. The decision communicated to the employee is final unless significant new evidence is submitted to the panel. This may be more appropriate to medical exemption.

APPLICATIONS FOR EXEMPTION AND CORRESPONDENCE

1. It is important for employees to note that no matters related to mandatory COVID-19 vaccination will be handled through any other forum except for the vaccination@curro.co.za email address. Personally addressed emails will not be answered and will be disregarded.

The reasons for the above decision are as follows

2. Management assistance related to queries will be addressed through the standard HR Smartsheet portal. Note that individual staff queries will not be addressed through this portal and will be referred back to the originator for submission through the vaccination@curro.co.za portal.
 - 2.1. One central point of reference is required to ensure data integrity and storage of all communication.
 - 2.2. Only responses given by the panel administering this email portal will be regarded as valid and representative of Curro's position in this regard. The panel administering this portal will be Marí Lategan, Louis Booyse, Frans Nel, Juanita Swart and Joy Smith.
 - 2.3. Data will be stored for future reference and review.
3. **Please remember:** The email address to be utilised for all queries related to COVID-19, submissions and communication will be vaccination@curro.co.za.

ALLOWING STAFF ON PREMISES

Allowing staff to proceed with duties must be done in an orderly and well-managed way in order not to set precedents that may later hamper the enforcement of the mandatory vaccination policy. The approach in this regard should be as follows:

3.1. Vaccinated staff

Once the register has been completed and proof submitted (could be prior on payroll) the employee may enter and proceed with normal duties. The register should be used to verify daily when the staff member reported for duty that they may enter. It is not required for the staff member already vaccinated to complete the register daily.

3.2. Tested staff submitting a negative test

The staff member may enter the premises and proceed with normal duties. The register needs to be maintained to ensure that employees submit test results fortnightly from the date of the first test onwards. Tests submitted may not be older than 72 hours. It is required that the first test be a PCR test. Thereafter the individual can for the period allowed, either through successful exemption or by way of management extending the mandatory vaccination deadline, submit rapid testing on a biweekly basis. School management is responsible to ensure that the monitoring of testing frequency and compliance takes place and is recorded in the register.

3.3. Staff not complying at all will be dealt with in accordance with points 2.3 and 2.4.

The process of monitoring could become laborious and quite an administrative burden. It is therefore essential that school management emphasises the importance of vaccination as well as the impact it may have on school resources.

EXEMPTION FOR VACCINATION APPLICATION

The Curro Mandatory Vaccination Policy issued on 13 December 2021 makes provision for an exemption application. Below are guidelines to be strictly followed when applying. Applications to be submitted to vaccination@curro.co.za (exemption application attached – Annexure A). The following submissions could be made:

Medical reasons

Various medical conditions or comorbidities which may pose some questions as to the appropriateness of the COVID-19 vaccination may exist. Pregnancy will be included in the exemption for medical reasons although it is widely accepted as safe. Staff members who have underlying conditions could therefore use the application for medical exemption. Additional guidelines appear on the application form.

1. The prescribed form attached to this document must be completed and submitted to vaccination@curro.co.za. It is important that you describe your condition as detailed as possible to ensure understanding and clarification.
2. A certified report from a doctor, specialist or preferably a physician should accompany your application. A letter or merely the staff member's statement will not suffice. It is important that the report be comprehensive for the external specialists to evaluate it based on the facts submitted. The report must clearly state your reference name, contact details and that you are indeed not fit to be vaccinated because of your medical condition. By signing the application, you give consent to the medical panel to contact the medical practitioner who issued the certificate to verify or clarify any uncertainties prevailing to the condition stipulated on the certificate. It must be noted that not complying with the process as set out above will not be in the interest of the applicant. Employees can only appeal the decision on the basis that new evidence that was not available at the time of the submission has come to light. Reviewing of the existing information only will not be allowed.



3. Any additional information that could impact the outcome of the application should be included in the application when submitted.
4. Application for medical exemption will be allowed until 31 January 2022. Should the medical reports not be available at the time, a written certificate from the medical practitioner should be submitted, indicating the reason for the delay as well as the anticipated date of submission of a report regarding the staff member's condition.
 - It is required that the applicant comply with the testing protocols as set out in this document whilst submitting the application or awaiting the outcome of the application.
 - The recommendation of the panel will be communicated to the applicant by the task team in writing.
 - If the outcome is negative, the applicant will be required to vaccinate.

Legal/Constitutional reasons

Some employees may believe they have legal, human, cultural and constitutional rights based on which they elect not to be vaccinated. Employees arguing these rights need to apply for exemption on the prescribed form. Additional guidelines appear on the application form (application form attached – Annexure A).

1. An application for exemption in this regard need to be factual, well defined and supported by legislative content. Merely putting forward a trivial argument that it is your right does not constitute grounds for exemption based on legal, human, constitutional or cultural rights.
2. The application for exemption based on the above must be supported by documentation and reference of specific aspects of legislation used in support of the application for exemption. Applications supported by legal practitioners and their details will be of assistance to the applicant in assessing and evaluating the argument put forward. By signing and submitting the application for exemption the applicant gives consent that the panel as assigned by Curro may contact the staff member or the representative legal practitioner to obtain more clarity and understanding regarding the application.

3. Any additional information that could impact the outcome of the application should be included in the application when submitted and will not be later reviewed.
4. Application for exemption based on legal, cultural human and constitutional rights will be allowed until 31 January 2022.
 - It is required that the applicant comply with the testing protocols as set out in this document whilst submitting the application or awaiting the outcome of the application.
 - The recommendation of the panel will be communicated to the applicant by the task team in writing.
 - If the outcome is negative, the applicant will be required to vaccinate.

Religious reasons

Staff members may have a conviction that it is against their religious beliefs to vaccinate. This is a highly emotional aspect and will be handled accordingly. In dealing with religious objections, it is important to differentiate between personal religious opinions and religious principles. Additional guidelines appear on the application form (see attached exemption application – Annexure A).

1. Employees applying for exemption needs to ensure that the ground for their application is clearly stated and comprehensive. Arguments must deal with the religious grouping dogma and belief system and needs to be supported by documentation from the governing body of the religion.
2. Documentation in support of the application for exemption needs to be on an official letterhead from the governing body of the religion and must be signed by the most senior person representing the religion in the RSA. Details of the person submitting this documentation on behalf of the religion must be clearly visible and must include a name, title and contact details.
3. Membership or active participation of the applicant as a member of the religion must accompany the documents from the religious institution.

4. Any additional information that could impact the outcome of the application should be included in the application when submitted and will not be later reviewed.

5. Application based on religious grounds will be allowed until 31 January 2022.

- It is required that the applicant comply with the testing protocols as set out in this document whilst submitting the application or awaiting the outcome of the application.
- The recommendation of the panel will be communicated to the applicant by the task team in writing.
- If the outcome is negative, the applicant will be required to vaccinate.



CURRO HOLDINGS LTD COVID-19 EMPLOYEE VACCINATION EXEMPTION REQUEST FORM

Last name	First name	Date of birth (month, day, year)	ID number

1. Religious exemption

- A written statement is required from the employee explaining the conflict with religious beliefs for a religious exemption. A religious exemption is not the same as a philosophical, moral or conscientious exemption. The applicable religion should be indicated in the statement.

2. Medical exemption

- A statement from a doctor explaining the medical condition is required for a medical exemption, including the time for which the exemption is required.
- Medical exemptions are to be reviewed annually or after the period stipulated for the initial exemption and people who no longer have a valid or approved documented reason for the exemption will be required to receive and document the missing immunisations.
- Curro reserves the right to have an employee claiming medical grounds for exemption, examined by a specialist medical officer of its choice.
- Exemption requests are evaluated on a case-by-case basis and are not automatic. Applicants will be notified by email once their request has been approved/denied.

3. Cultural exemption

- Cultural exemption must be supported by written evidence and support documentation that vaccination is indeed opposing to the specific culture.
- The culture must be specified.
- The way the application of vaccinations infringe on the cultural practices must be defined.
- Statements and submissions made by legislative cultural representative bodies must be accompanying the application.

4. Constitutional exemption

- Reason for exemption clarifying how this will infringe your rights.

I am requesting an exemption from the immunisation requirements:

- ☐ Medical exemption
☐ Religious exemption
☐ Cultural exemption
☐ Constitutional exemption

Employee statement and declaration in terms of exemption application

I verify that the information I am submitting in support of my request for an exemption is complete and accurate to the best of my knowledge, and I understand that any intentional misrepresentation contained in this request may result in disciplinary action.

Employee signature: _____ Date: _____

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PROCESS DURING AND AFTER EXEMPTION APPLICATION

To regulate and manage the process during exemption applications, the following procedures will be followed:

- 6.1. Once a properly completed application has been received, the staff member will receive written confirmation that the application has been received and processed. The employee will be advised of progress during the assessment of application. All communication in this regard will be done through the email address vaccination@curro.co.za. Written comments and statements related to exemption will not be replied to unless it is received in the prescribed format.
- 6.2. Once a recommendation has been received from the specialist panel, the administrators of vaccination@curro.co.za will advise the applicant accordingly. The executive head will in addition be advised accordingly.
- 6.3. Management queries in terms of policies and procedures must be submitted via the HR Smartsheet. Please note that no individual staff member exemption applications will be addressed at this portal and will be referred to be submitted to vaccination@curro.co.za.
- 6.4. Employees who successfully applied for exemption will be advised accordingly and will not be required to vaccinate. Medical certificates must state the term for which the employee will be exempted. Curro reserves the right to reasonably request staff members for additional information or for renewed certification not to vaccinate.
- 6.5. Unsuccessful applicants will be notified accordingly in writing and will be required to vaccinate.
- 6.6. Employees not vaccinated for whatever reason are required to test in accordance with the policy set out in this document.



REFUSAL TO TEST

Curro as a mandatory vaccination company requires all its staff members to be vaccinated free of charge as part of the government's initiative to get all citizens and people visiting South Africa vaccinated. As a temporary alternative, or for exemption reasons, staff are given the opportunity to be tested to prove that they are not infected at their own cost and in accordance with the testing guidelines set out in this document.

- 7.1. Employees who are not vaccinated, are waiting for the exemption outcome, who were successful or unsuccessful in the application for vaccination and who refuse to be tested will not be allowed on Curro premises after 17 January 2022.
- 7.2. Continuous refusal to test, resulting in a refusal to enter Curro premises and resulting in absenteeism will be treated in accordance with the relevant process and policies.
- 7.3. It remains Curro's intention to ensure that employees choose to be vaccinated and tested without management having to engage policies and procedures.

APPEAL PROCESS

Appeals will not be standard practice and the recommendation of the panel and decision communicated to the applicant will be final. In the event of medical exemption it is understood that circumstances surrounding a staff member's health may change which could impact the prior decision.

The staff member is free to appeal the decision based on new scientific and medical evidence. Merely reviewing existing information will not constitute grounds for an appeal.

Appeals for other reasons will be dealt with on merit. If no new substantive evidence is submitted, then the appeal will be dismissed.



REFUSAL TO COMPLY IN EVERY ASPECT

Curro indicated that it would like to see all its staff members vaccinated and allowed, through a lenient process, employees to use the opportunities presented by the government and various institutions to get vaccinated. Information was made readily available to employees to allow them to make an informed decision based on scientific evidence from reputable institutions.

Whilst respecting everyone's rights, beliefs and medical conditions, the company has a responsibility towards hundreds of thousands of persons in our communities daily to support the best manner to beat COVID-19. Alternatives were also put in place to assist those staff members who are in doubt and needed time to decide for the greater good of the society, themselves, their families, and our clients.

Staff refusing to comply with the directive to vaccinate or follow the procedure for exemption will be further engaged in order to convince them that they need to vaccinate or apply for exemption. If however the point is reached where a staff member refuses to comply, Curro will commence engagement of the appropriate policies. Since most of our employees have already vaccinated, we trust that the staff refusing without good reason will reconsider.





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www.curro.co.za