



**FIRST TECHNOLOGY INVESTMENTS (PTY) LTD
AND ALL OF ITS AFFILIATES**

MANDATORY COVID-19 VACCINATION POLICY

REVISION HISTORY

VERSION NUMBER	REVISION DATE	EFFECTIVE DATE	COMPILED BY	APPROVED BY	DESCRIPTION OF CHANGE
01	09/2021	09/2021	Tanya Boer	Richard Hammond	First version
01	09/2021	09/2021	Tanya Boer	Richard Hammond	Second version

DEPARTMENT: HUMAN RESOURCES

IDENTIFICATION	STORAGE	PROTECTION	RETENTION TIME	VERSION IN PROCESS	DISPOSITION
MANDATORY COVID-19 VACCINATION POLICY	Electronic	Back-up	N/A	V1	N/A

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This document (including but not limited to manuals, policies, procedures, forms referenced or included herein) (“Policy”) applies to First Technology Investments (Pty) Ltd and all of its Affiliates (hereinafter referred to as the “Company”).

“Affiliates” means, in relation to First Technology Investments Pty) Ltd, a subsidiary of this entity, or any division or operating branch of each subsidiary of this entity and all its subsidiaries.

“Employee(s)” means an employee and/or any member of staff and/or independent contract and/or subcontractor of the Company and/or any individual or entity involved in the provision of services on behalf of the Company.

1. INTRODUCTION

- 1.1. The Company is required by law to ensure that its working environment is healthy and safe as it impacts Employees, their families and the general public. The Company assures all Employees of its continuing commitment to their health and safety, particularly in the context of biological hazards such COVID-19 which is easily contracted, is widespread, and has a severe impact in the absence of a legally compliant vaccination policy and plan.
- 1.2. Various COVID-19 vaccines have been approved by the SA Health Products Regulatory Authority (SAHRPA) and are freely available to all members of the public. In order to meet its fiduciary duty to Employees, customers and the public in general, the Company is implementing this Policy which includes mandatory vaccination requirements, but subject to the procedural and substantive provisions of law which include the following Constitutional Rights and relevant considerations:
 - Freedom and security of the person
 - Freedom of religion, belief and opinion
 - Risk for severe C19 disease or death due to age or comorbidities.
- 1.3. It must however be understood that constitutional and statutory rights are never one dimensional and rights may be limited when there are justifiable grounds for doing so. Section 36 of the Constitution also provides for the limitation of constitutional rights insofar it is reasonable and justifiable in an open and democratic society based on human dignity, equality, and freedom, and having regard to
 - 1.3.1. the nature of the right;
 - 1.3.2. the importance of the purpose of the limitation;
 - 1.3.3. the nature and extent of the limitation;
 - 1.3.4. the relation between the limitation and its purpose; and
 - 1.3.5. less restrictive means to achieve the purpose.
- 1.4. Within the employment context, the Employee’s right to choose not to be vaccinated may however impact their right to employment, as the Company may cite the inherent requirements of the work or its operational requirements. As such while the Company may not force an Employee to be vaccinated, Employees should understand that under certain circumstances it may be fair to exclude the Employee from employment because of their failure to do so.
- 1.5. Compliance with this Policy is mandatory as the Company’s operational requirements necessitate that every Employee need be fully vaccinated unless the Employee has valid reasons for non-compliance and subject to the remaining terms of this Policy. The Company shall take reasonable steps to accommodate any concerns or objections that an Employee may have as more fully set out in this Policy.
- 1.6. In summary, although vaccinations are not compulsory by law, mandatory vaccination policies may be implemented if it is justified in terms of the Company’s operational requirements or an inherent

requirement of the job. Employees will retain the right to choose whether to be vaccinated, but must understand that their choice may impact on their continued or future employment

- 1.7. Employees are reminded that the current Covid-19 Company policies such as the Face Mask Policy, Social Distancing Policy, Screening Policy, Temperature Check and Health Screening Protocols, Cleaning and Sanitation Policy, Occupational Health and Safety Policy and other policies and standards still apply until reviewed and amended by the Company. All Employees are required to fully comply and co-operate with the Company in this regard and will be notified of any changes.

2. EXEMPTION REQUESTS

- 2.1. Employees who are seeking exemption from the Company's mandatory vaccination requirements are obliged to promptly make written submissions to their direct manager as well their appointed Covid-19 compliance officer. The submission must clearly set out the grounds for the Employees request for exemption and be supported by all necessary evidence and together with any suggestions that they may have. The Company reserves the right to request additional documentation or information from the Employee to support his/her exemption request, as well as the right to refer the Employee to a qualified medical professional of the Company's choosing at the cost of the Company. The Employees direct manager and the Covid-19 compliance will then escalate and discuss the exemption request with the HR Department for discussion and determination. The Company will keep any medical information obtained or provided in connection with the request confidential and use it solely for the purposes of assessing the Employees exemption request. The Company will approve or reject each exemption request based on the merits of each case.
- 2.2. Exemption requests will only be considered in respect of the following matters:
 - 2.2.1. Freedom and security of the person (including the right to bodily and psychological integrity), this must be reasonably justified based on legitimate concerns of the Employee.
 - 2.2.2. Freedom of religion, belief and opinion (these must be legitimate religious and similar considerations from Employees with sincerely held religious beliefs, observances, or practices that can be shown to conflict with getting vaccinated)
 - 2.2.3. Medical grounds (medical reasons on a case-by-case basis for conditions including but not limited to history of certain allergic reactions, and any other medical conditions that are a contraindication to the COVID-19 vaccine).
- 2.3. Where an Employee refuses to be vaccinated on any constitutional or medical grounds and is seeking an exemption, the Company shall:
 - 2.3.1. Counsel the Employee and, if requested, allow the Employee to seek guidance from a health and safety representative or chosen worker representative; and/or
 - 2.3.2. Refer the Employee for further medical evaluation should there be a medical contra-indication for vaccination; and/or
 - 2.3.3. If necessary, take steps to reasonably accommodate the Employee in a position that does not require the Employee to be vaccinated.
- 2.4. The Company will consider all exemption requests in good faith and where appropriate take reasonable measures to accommodate Employees as far as possible. Where counselling and further medical evaluation indicate no reason not to vaccinate and reasonable accommodation options are not viable, and/or a refusal to vaccinate may lead to circumstances where the Employee cannot fulfil his/ her duties and/or poses a risk to other employees by nature of his/her work, this may result in the Employee being

dismissed based on operational requirements or on the grounds of incapacity after due course and process having been followed.

3. VACCINE RISK ASSESSMENT AND IMPLEMENTATION PLAN

- 3.1. In reaching the Company's stance on vaccinations, the Company has made specific reference to its current Covid-19 risk assessment. The risk assessment was undertaken in such a way as to take into account the specific circumstances of the workplace and the requirements of the OHS Act Regulations for Hazardous Biological Agents.
- 3.2. The outcome of the risk assessment, which took into account the nature of the workplace and the work required to be rendered by Employees, has identified the Employees who, by virtue of the risk of transmission through their work, inherent requirements forming part of their duties, or who are at risk for severe COVID-19 disease or death due to their age or comorbidities, must be vaccinated
- 3.3. The Company intends to continue following its current Covid-19 risk assessment, which means certain identified Employees or groups of Employees (based on their risk level) will be expected to get vaccinated or make an exemption request by no later than the following pre-defined dates:
 - 3.3.1. Phase 1 – Employees identified as “high risk” in the risk assessment are required to be fully vaccinated or formally exempt from vaccination by no later than 1 December 2021;
 - 3.3.2. Phase 2 – Employees identified as “medium risk” in the risk assessment are required to be fully vaccinated or formally exempt from vaccination by no later than 1 January 2022;
 - 3.3.3. Phase 3 – Employees identified as “low risk” in the risk assessment are required to be fully vaccinated or formally exempt from vaccination by no later than 1 February 2022;
- 3.4. Employees can request a copy of the Company's risk assessment or obtain clarification on whether they are high, medium, or low risk, upon request to their direct manager and/or appointed Covid-19 compliance officer.

4. VACCINE ADMINISTRATION AND PROOF

- 4.1. The Company will assist the Employee as far as possible in making arrangements for the Employee to be vaccinated and ensuring that the Employee has the necessary access to an approved vaccination site. Employees who require assistance, including but not limited to scheduling a time to be vaccinated, identifying a suitable vaccination site, or transport to and from the vaccination site, should contact their direct line manager for assistance.
- 4.2. Once vaccinated, and including Employees who have already been vaccinated, the Employee must provide written proof of vaccination from the vaccine administrator, including the vaccination place, date(s), and the Employee's name, as soon as is reasonably possible after having received same. Employees are not obliged to include any other private, confidential, or personal information with the proof of vaccination. All proof of vaccination must be submitted to your direct line manager and Covid-19 compliance officer as soon as reasonably possible after being vaccinated.

5. INFORMATION ABOUT COVID-19 AND VACCINES

- 5.1. It is important that Employees are appropriately educated about the vaccine in order to make an informed decision based on accurate information that is not false or misleading.
- 5.2. The Department of Health has highlighted the benefits and safety of all approved COVID-19 vaccines. It recommends that all individuals who can safely do so, get vaccinated against COVID-19. COVID-19 vaccines currently approved or in development do not contain the COVID-19 virus and will not make recipients sick with COVID-19 nor will getting the COVID-19 vaccine make recipients test positive for COVID-19. COVID-19 vaccinations have been shown to be highly effective at preventing recipients from getting sick with COVID-19. COVID-19 vaccines do not change DNA. COVID-19 vaccinations are an important tool in helping to stop the pandemic and are provided for free.
- 5.3. The Company recommends that all Employees take note of the following information in respect of the nature, extent and benefits of COVID-19 vaccines.
- 5.3.1. **Official Government Regulations and Guidelines on COVID-19**
All official government regulations and guidelines are available at <https://gov.za/coronavirus/guidelines>
- 5.3.2. **Official Resources**
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|-----------------------------|---|
| NICD website: | http://www.nicd.ac.za |
| COVID-19 information | https://sacoronavirus.co.za |
| Coronavirus 24-hour hotline | 0800 029 999 |
| Coronavirus Whatsapp | 060 012 3456 |
- 5.3.3. **Additional Resources**
- www.gov.za
www.facebook.com/GovernmentZA
www.sacoronavirus.co.za
<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety/adverse-events.html>
- 5.3.4. **First Technology Q&A webinar on Covid-19 vaccine**
[Webinar First Technology on COVID vaccine. Learn more..mp4](#)
- 5.4. The side effects of the vaccines may vary from person to person, however, below are possible side effects, which include but are not limited to:
- 5.4.1. Around the vaccination site (Typically the upper arm):
- 5.4.1.1. Pain
 - 5.4.1.2. Redness
 - 5.4.1.3. Swelling
- 5.4.2. Throughout the rest of the body:
- 5.4.2.1. Tiredness
 - 5.4.2.2. Headache
 - 5.4.2.3. Muscle pain
 - 5.4.2.4. Chills
 - 5.4.2.5. Fever
 - 5.4.2.6. Nausea

6. AMENDMENTS

The Company reserves the right to amend the provisions of this Policy at any time in its sole discretion. Where applicable, any amendments to statute and regulations shall automatically apply and/or amend the provisions of this Policy.

7. ADMINISTRATIVE MEASURES

7.1. The Company is committed to supporting the implementation of this Policy and promoting all Employees to be vaccinated, and as such has made the following benefits available to all Employees:

7.1.1. Where requested, the Company shall provide administrative support to assist Employees to register on the **Electronic Vaccine Data System Registration Portal** for COVID-19;

7.1.2. Employees will be entitled to special leave day(s) for the day that they go to get vaccinated (1 day for the J&J vaccine and 2 days for the Pfizer vaccine);

7.1.2.1. Employees who have been vaccinated already can still apply for this leave on the Company's ESS portal (under the special leave tab) and must attach the Covid-19 vaccination card as proof of vaccination.

7.1.2.2. Employees who are yet to be vaccinated will inform their direct manager of the vaccination date up front and complete the leave application on the Company's ESS portal upon return from vaccination so that they can attach their vaccination card.

7.2. Employees must provide written proof of vaccination from the vaccine administrator, including the vaccination place, date(s), and name, as soon as is reasonably possible after having received same. Employees must not include any other private, confidential, or personal information with the proof of vaccination.

7.3. Employees can submit written proof of vaccinations (in the form a valid vaccination card) either by providing this to their direct line manager or uploading it onto the Company's ESS portal.

8. EMPLOYEES PRESENTING WITH ADVERSE REACTIONS FOLLOWING VACCINATION

Should an Employee suffer any adverse reactions as a result of a COVID-19 vaccination and is unable to work, the Employee shall be entitled to take paid sick leave (even if the Employee's sick leave entitlement has been exhausted) and the Company will accept a COVID-19 vaccination card in lieu of a medical certificate, provided that should the Employee continue to have adverse reactions for more than 2 (two) days following the date of vaccination then the Employee will be required to seek medical attention and provide the Company with a medical certificate.

I, _____, with ID number _____, hereby agree that I have read and understood the contents of the Mandatory Covid-19 Vaccination Policy.

Employee signature as receipt hereof	
Date	