

The Inland Real Estate Companies, LLC and its Subsidiaries and Affiliates (collectively, “Inland”)	HUMAN RESOURCES	
Subject: Inland COVID-19 Vaccination, Testing and Face Coverings	Issue Date: January 10, 2022	Revision No.: Initial
Title: Inland COVID-19 Testing Policy		Revision Date: Initial

Purpose:

Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities and in the nation as a whole. Inland encourages all employees to receive COVID-19 vaccinations and related booster shots to protect themselves and other employees. However, should an employee choose not to be vaccinated, this policy’s sections on testing will apply. This policy complies with OSHA’s Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501).

Scope:

This COVID-19 Policy on vaccination, testing and face covering use applies to all employees of Inland. It does not apply to employees who do not report to a workplace where other individuals (such as coworkers or customers) are present, employees who work 100% remotely and do not interact with coworkers or customers and employees who work exclusively outdoors.

All employees are encouraged to be fully vaccinated. Employees are considered fully vaccinated two weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses. For example, this includes two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, two weeks after a single-dose vaccine, such as Johnson & Johnson’s vaccine, or two weeks after the second dose of any combination of two doses of different COVID-19 vaccines as part of one primary vaccination series.

Employees who are not fully vaccinated will be required to provide proof of weekly COVID-19 testing.

All employees are required to report their vaccination status and, if vaccinated, provide proof of vaccination. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if not fully vaccinated, their testing results. Employees not in compliance with this policy will be subject to discipline up to and including termination. Employees may be entitled to a reasonable accommodation if they cannot be vaccinated and/or wear a face covering (as otherwise required by this policy) because of a disability, or if the provisions in this policy for vaccination, and/or testing for COVID-19, and/or wearing a face covering conflict with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated in writing by the employee. Any such requests should be directed to HR at (630) 954-5670 or hr@inlandgroup.com. All such requests will be handled in accordance with applicable laws and regulations and your employer’s employee handbook.

Procedures:

Overview and General Information

Vaccination

Any Inland employee who chooses to be vaccinated against COVID-19 must be fully vaccinated no later than [February 9, 2022](#). Any employee not fully vaccinated by [February 9, 2022](#) will be subject to the regular testing requirements of the policy.

To be fully vaccinated by [February 9, 2022](#), an employee must:

- Obtain the first dose of a two dose vaccine no later than [February 9, 2022](#); and the second dose no later than [February 9, 2022](#); or
- Obtain one dose of a single dose vaccine no later than [February 9, 2022](#).

Employees will be considered fully vaccinated two weeks after receiving the requisite number of doses of a COVID-19 vaccine as stated above. An employee will be considered partially vaccinated if they have received only one dose of a two dose vaccine. Employees should contact HR if they received their primary vaccination dose(s) after January 10, 2022 but prior to February 10, 2022 to confirm testing requirements.

Testing

All employees who are not fully vaccinated as of [February 9, 2022](#) will be required to undergo regular COVID-19 testing. Policies and procedures for testing and face coverings are described in the relevant sections of this policy.

Vaccination Status and Acceptable Forms of Proof of Vaccination

Vaccinated Employees

In order to be considered vaccinated for purposes of this policy, all vaccinated employees must provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted by emailing a copy or photo of your vaccination card or vaccination paperwork to HR-Covid-Vaccine@inlandgroup.com. Do not send any additional information other than either your vaccination card or other proof of vaccination. You should NOT provide any medical or genetic information (or any other information) with the proof of vaccination.

Acceptable proof of vaccination status is:

1. The record of immunization from a health care provider or pharmacy;
2. A copy of the COVID-19 Vaccination Record Card;
3. A copy of medical records documenting the vaccination; or
4. A copy of immunization records from a public health, state, or tribal immunization information system.

Proof of vaccination generally should include the employee's name, the type of vaccine administered, the date(s) of administration, and the name of the health care professional(s) or clinic site(s) that administered the vaccine. In some cases, state immunization records may not include one or more of these data fields, such as clinic site; in those circumstances Inland will still accept the state immunization record as acceptable proof of vaccination.

If an employee is unable to produce one of these acceptable forms of proof of vaccination, despite attempts to do so (e.g., by trying to contact the vaccine administrator or state health department), the employee can provide a signed and dated statement attesting to their vaccination status (fully vaccinated or partially vaccinated) and attesting that they have lost and are otherwise unable to produce one of the other forms of acceptable proof. The signed and dated statement must include the following language:

“I declare (or certify, verify, or state) that this statement about my vaccination status is true and accurate. I understand that knowingly providing false information regarding my vaccination status on this form may subject me to termination of my employment and criminal penalties.”

An employee who attests to their vaccination status in this way should to the best of their recollection, include in their attestation the type of vaccine administered, the date(s) of administration and the name of the health care professional(s) or clinic site(s) administering the vaccine.

Inland will maintain a record of each employee’s vaccination status and will preserve copies of acceptable proof of vaccination for each employee who is fully or partially vaccinated. Inland will utilize such records to maintain a roster of each employee’s vaccination status. Inland will consider such records and the roster to be medical records and will be confidentially maintained pursuant to applicable law.

All Employees

All employees, both vaccinated and unvaccinated, must inform Inland of their vaccination status. Such disclosure obligations continue upon employees’ future COVID-19 vaccination events. The following table outlines the requirements for submitting vaccination status documentation.

<u>Vaccination Status</u>	<u>Instructions</u>	<u>Deadline(s)</u>
Employees who are fully vaccinated.	Submit proof of vaccination that indicates full vaccination.	February 9, 2022 or upon future receipt of vaccination
Employees who are partially vaccinated (i.e., one dose of a two dose vaccine series).	Submit proof of vaccination that indicates when the first dose of vaccination was received, followed by proof of the second dose when it is obtained.	February 9, 2022 or upon future receipt of vaccination
Employees who are not vaccinated.	Submit statement that you are unvaccinated, but are planning to receive a vaccination by the deadline. OR Submit statement that you are unvaccinated and not planning to receive a vaccination.	February 9, 2022

Supporting COVID-19 Vaccination

An employee may take up to four hours of paid time per dose (initial dose(s) and booster(s)) to travel to the vaccination site, receive a vaccination, and return to work. Employees should use code "COVAC" in UKG for this paid time and request such time through the leave request tool in UKG. This would mean a maximum of eight hours of paid time for employees receiving two doses. If an employee spends less time getting the vaccine, only the necessary amount of paid time will be granted. Employees who take longer than four hours to get the vaccine must send their supervisor(s) an email documenting the reason for the additional time (e.g., they may need to travel long distances to get the vaccine). Any additional time requested will be granted, if reasonable, but will not be paid; in that situation, the employee can elect to use accrued leave, e.g., sick leave to cover the additional time. If an employee is vaccinated outside of their approved paid time they will not be compensated.

Upon receiving each vaccine dose, each employee must provide a copy of the vaccination card or vaccination paperwork to HR. Proof of vaccination status can be submitted by emailing a copy or photo of your vaccination card or vaccination paperwork to HR-Covid-Vaccine@inlandgroup.com. Do not send any additional information other than either your vaccination card or other proof of vaccination. You should NOT provide any medical or genetic information (or any other information) with the proof of vaccination.

Employees may utilize accrued sick leave immediately following each dose if they have side effects from the COVID-19 vaccination that prevent them from working. This sick leave should be requested through the leave request tool in UKG. Employees who have no sick leave will be granted up to two days of additional sick leave immediately following each dose, if necessary. If an employee is experiencing side effects for three or more consecutive days following each dose and desires to use accrued sick time to cover those additional days, the employee will need to provide a doctor's note to HR.

All employees will receive a copy of the "Key Things to Know About COVID-19 Vaccines" guidance as published by the Centers for Disease Control."

Employee Notification of COVID-19 and Removal from the Workplace

Inland requires employees to promptly notify their supervisor and HR (at (630) 954-5670 or hr@inlandgroup.com) when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider. See the Inland COVID FAQs for more information about notifying Inland if you are diagnosed with COVID-19.

COVID -19 Related Medical Removal from the Workplace

Inland has also implemented a policy for keeping employees experiencing COVID -19 symptoms and COVID-19 positive employees from the workplace in certain circumstances. Inland will immediately send an employee home from the workplace if they are experiencing COVID-19 symptoms, have received a positive COVID-19 test or have been diagnosed with COVID-19 by a licensed healthcare provider (*i.e.*, immediately send the employee home or to seek medical care, as appropriate). See the Inland COVID FAQs for more information about notifying Inland if you are experiencing COVID-19 symptoms or are diagnosed with COVID-19.

Return to Workplace Criteria

Employees who have tested positive for COVID-19, have been exposed to COVID-19 or who live with someone who has tested positive for COVID-19 are required to follow the return to workplace guidelines below:

<u>Situation</u>	<u>Length of Quarantine</u>	<u>Documentation for Return or Testing Requirement¹</u>
Positive COVID-19 Test	<p>5 days from the date of the positive test. If asymptomatic after 5 days, employees may return to their Inland workplace but must wear a mask at the workplace as is mandatory per the Inland Policy. If the employee is able to work remotely for days 6-10, it is recommended to do so.</p> <p>If an employee has a fever or any other symptoms (except loss of taste or smell) 5 days after the positive result, employee must stay home until fever and other symptoms resolve.</p>	Employee must complete Health Screening Questionnaire and certify they are asymptomatic in order to return to Inland workplace.
Unvaccinated Persons who were exposed to COVID-19 (for more than 15 minutes in close contact ²)	5 days from the date of the exposure. If asymptomatic after 5 days, employees may return to their Inland workplace but must wear a mask at the workplace as is mandatory per the Inland Policy.	Doctor's release or negative test result taken at least 5 days after exposure.
Unvaccinated Persons who are taking care of someone/living with someone who tested positive for COVID-19	5 days from the date of the exposure. If asymptomatic after 5 days, employees may return to their Inland workplace but must wear a mask at the workplace as is mandatory per the Inland Policy.	Doctor's release or negative test result taken at least 5 days after exposure.
Fully Vaccinated ³ and Boosted Persons who were exposed to COVID-19 (for	No quarantine requirement.	Doctor's release or negative test result taken at least 5 days after exposure.

¹ Employees must use a third-party testing facility when providing a return to office negative test result. At-home test rapid results are not acceptable.

² For COVID-19, a close contact is anyone who was within 6 feet of an infected person for at least 15 minutes (consecutive or non-consecutive). An infected person can spread COVID-19 starting 48 hours (or 2 days) before the person had any symptoms or tested positive for COVID-19. One is still considered a close contact even if they were wearing a mask while they were around someone with COVID-19.

³ Fully vaccinated means that it has been at least two weeks since you received:

<u>Situation</u>	<u>Length of Quarantine</u>	<u>Documentation for Return or Testing Requirement¹</u>
more than 15 minutes in close contact)		
Persons Fully Vaccinated for less than 5 months (Moderna and Pfizer) or 2 months (J&J) who were exposed to COVID-19 (for more than 15 minutes in close contact)	No quarantine requirement.	Doctor's release or negative test result taken at least 5 days after exposure.
Persons Fully Vaccinated for over 5 months (Moderna and Pfizer) or 2 months (J&J) and not boosted Persons who were exposed to COVID-19 (for more than 15 minutes in close contact)	5 days from the date of the exposure. If asymptomatic after 5 days, employees may return to their Inland workplace but must wear a mask at the workplace as is mandatory per the Inland Policy.	Doctor's release or negative test result taken at least 5 days after exposure.
Fully Vaccinated and Boosted Persons who are taking care of someone/living with someone who tested positive for COVID-19	No quarantine requirement.	Doctor's release or negative test result that was performed no earlier than 5 days after the date that the person who employee is taking care of is able to end their own isolation
Persons Fully Vaccinated for less than 5 months (Moderna and Pfizer) or 2 months (J&J) who are taking care of someone/living with someone who tested positive for COVID-19.	No quarantine requirement.	Doctor's release or negative test result that was performed no earlier than 5 days after the date that the person who employee is taking care of is able to end their own isolation
Persons Fully Vaccinated for over 5 months (Moderna and Pfizer) or 2 months (J&J) and not boosted Persons who are taking care of someone/living with someone who tested positive for COVID-19.	5 days from the date that the infected person is able to end their own isolation. Any time a new household member with whom an employee has had close contact gets sick with COVID-19, that employee will have to restart his or her quarantine.	Doctor's release or negative test result that was performed no earlier than 5 days after the date that the person who employee is taking care of is able to end their own isolation

If an employee has severe COVID-19 or an immune disease, Inland will follow the guidance of a licensed healthcare provider regarding return to Inland workplace.

1) your second dose of the Pfizer/BioNTech or Moderna COVID-19 vaccine; OR
2) your single dose of the Johnson & Johnson COVID-19 vaccine.

COVID-19 Testing

All employees who are not fully vaccinated, or who fail to provide proof of vaccination as specified in this policy, will be required to follow the Inland testing protocol in order to comply with this policy. Employees should contact HR if they received their primary vaccination dose(s) after January 10, 2022 but prior to February 10, 2022 to confirm testing requirements.

Employees who report to the workplace at least once every seven days:

(A) must be tested for COVID-19 at least once every seven days; and

(B) must provide documentation of the most recent COVID-19 test result to HR no later than the seventh day following the date on which the employee last provided a test result.

Any employee who does not report to the workplace during a period of seven or more days (e.g., if they were teleworking for two weeks prior to reporting to the workplace):

(A) must be tested for COVID-19 within seven days prior to returning to the workplace; and

(B) must provide documentation of that test result to HR upon return to the workplace.

If an employee does not provide documentation of a COVID-19 test result as required by this policy, they will be removed from the workplace until they provide a test result.

Employees who have received a positive COVID-19 test, or have been diagnosed with COVID-19 by a licensed healthcare provider, are not required to undergo COVID-19 testing for 90 days following the date of their positive test or diagnosis. After 90 days following the date of a positive test or diagnosis, an employee will be required to resume weekly testing.

Inland will maintain a record of each test result provided by employees. Inland considers these records to be medical records and will confidentially maintain and preserve such records in accordance with applicable law.

For the purposes of this policy, a COVID-19 test means a test for SARS-CoV-2 that is:

(i) Cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the FDA to detect current infection with the SARS-CoV-2 virus (e.g., a viral test);

(ii) Administered in accordance with the authorized instructions; and

(iii) Not both self-administered and self-read unless observed by Inland-authorized personnel or an authorized telehealth proctor. Examples of tests that satisfy this requirement include tests with specimens that are processed by a laboratory (including home or on-site collected specimens which are processed either individually or as pooled specimens), proctored over-the-counter tests, point of care tests, and tests where specimen collection and processing is either done or observed by Inland-authorized personnel.

Testing Procedures and Protocols

Testing will occur at each Inland workplace. Prior to February 9, 2022, specific details regarding testing procedures and protocols at each Inland worksite will be provided to employees. All costs related to testing will be paid by Inland.

Face Coverings

Inland requires all employees regardless of vaccination status to wear a face covering. This face covering policy is already in effect and continues to be in effect. Face coverings must: (i) completely cover the nose and mouth; (ii) be made with two or more layers of a breathable fabric that is tightly woven (i.e., fabrics that do not let light pass through when held up to a light source); (iii) be secured to the head with ties, ear loops, or elastic bands that go behind the head. Face coverings must be replaced when wet, soiled, or damaged (e.g. it is ripped, has holes, or has broken ear loops).

Employees must wear face coverings over the nose and mouth when inside any Inland property (including open spaces and common areas) or when occupying a vehicle with another person for work purposes. Policies and procedures for face coverings will be implemented, along with the other provisions required by OSHA's COVID-19 Vaccination and Testing ETS, as part of a multi-layered infection control approach for unvaccinated workers. Inland will not prevent any employee from voluntarily wearing a face covering or facemask unless doing so would create a hazard of serious injury or death, such as interfering with the safe operation of equipment.

The following are exceptions to Inland's requirements for face coverings:

1. When an employee is alone in a room with floor to ceiling walls and a closed door.
2. For a limited time, while an employee is eating or drinking at the workplace or for identification purposes in compliance with safety and security requirements.
3. When an employee is wearing a respirator or facemask.
4. Where Inland has determined that the use of face coverings is infeasible or creates a greater hazard (e.g., when it is important to see the employee's mouth for reasons related to their job duties, when the work requires the use of the employee's uncovered mouth, or when the use of a face covering presents a risk of serious injury or death to the employee).

New Hires:

All new employees are required to comply with the vaccination, testing and face covering requirements outlined in this policy as soon as practicable and as a condition of employment. Potential candidates for employment will be notified of the requirements of this policy prior to the start of employment.

Confidentiality and Privacy:

All medical information collected from individuals, including vaccination information, test results, and any other information obtained as a result of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.

Questions:

Please direct any questions regarding this policy to HR at (630) 954-5670 or hr@inlandgroup.com.