

# COVID-19 Vaccination Policy

KSI Auto Parts (the “Company”) is committed to providing and maintaining a safe workplace. Consistent with this commitment, the Company has adopted this policy (the “Policy”) to require that, in accordance with the terms set forth below, all employees receive a COVID-19 vaccine or obtain an approved exemption as an accommodation, as permitted under applicable law. This Policy applies to all employees, regardless of full-time, part-time, temporary, exempt, non-exempt, or any other status or classification, except for employees who do not report to a workplace where other individuals (such as coworkers or customers) are present, employees while working from home, and employees who work exclusively outdoors (except for those located in New York City) without any contact with other employees or any members of the public. It does not apply to customers or visitors.

This Policy has been adopted in response to the COVID-19 pandemic and the state of emergency created by the pandemic as declared by various levels of government officials. It is intended to safeguard the health and wellbeing of employees, their families, customers, visitors, others who spend time in our facilities, and the public consistent with guidance provided by the Centers for Disease Control and Prevention (CDC) and other public health authorities. This Policy is intended to comply with all applicable laws, including OSHA’s Emergency Temporary Standard on Vaccination and Testing (“ETS”) (29 CFR 1910.501); provided, however, that in the event this Policy conflicts with applicable law in any way, applicable law shall govern, control, and supersede the conflicting portion of this Policy.

The Company reserves the right to revise, amend, supplement, or rescind all, or a portion of, this Policy at any time and without prior notice. Employees will be notified of any such changes as they become effective.

## Policy Requirements

This Policy requires that all employees either (i) establish that they have been fully vaccinated against COVID-19; or (ii) obtain an approved exemption as an accommodation (the process for seeking an accommodation is explained below). Employees are considered “fully vaccinated,” for purposes of this Policy, if (x) they have completed a full vaccination series with a designated COVID-19 vaccine (with, if applicable, at least the minimum recommended interval between doses), (y) they have completed a COVID-19 booster vaccine dose once eligible to receive one. The Company will maintain, and update from time to time as necessary, a list of the designated vaccine(s) covered by the Policy. This list will also identify the corresponding deadline(s) for employees to establish that they have received such vaccine(s). A copy of this list can be obtained from Human Resources, [hr@ksiautoparts.com](mailto:hr@ksiautoparts.com). Employees who do not fulfill one of the two above requirements will be placed on an unpaid leave of absence until such time as they have established compliance with this Policy, unless applicable law requires otherwise. The Company will evaluate the status of non-compliant employees periodically and reserves the right to take any and all actions related to such employees consistent with applicable law. To establish that they have received a vaccination under requirement (i) above, an employee must present written evidence of immunization from an authorized healthcare provider. The evidence of immunization should not under any circumstance, however, include any medical or genetic information concerning the employee or

any other individual. The Company will pay for the cost of any vaccination required by this Policy or reimburse any employee-incurred cost associated with obtaining the vaccination from their own healthcare provider (e.g., reimbursement of any co-payment). The Company will allow employees to use paid leave for time spent receiving a vaccination to the extent required under applicable law.

The Company may also elect to assist employees by providing on-site access to vaccinations and/or identifying sites where employees may receive vaccinations. In the event that the Company elects to assist employees in one or both of these ways, additional information will be provided either under separate cover or through an update to this Policy.

### **Requests for Accommodations** *For All Employees*

In the event that an employee cannot get vaccinated due to a disability (as defined by applicable law), pregnancy (or childbirth or a related medical condition), being a nursing mother, having a documented medical condition that contraindicates the vaccination, or any other trait, characteristic, or class for which applicable law requires the Company to provide reasonable workplace accommodations, or an employee objects to being vaccinated on the basis of sincerely held religious beliefs and practices, the Company will engage in an interactive process with the employee to determine whether a reasonable accommodation can be provided that does not create an undue hardship for the Company and/or does not pose a direct threat to the health or safety of others in the workplace and/or to the employee.

### **For Florida Employees Only**

In addition to the above reasons for which an accommodation may requested, employees based in Florida may request an exemption from the mandatory vaccination requirement of this policy for any reason permitted pursuant to state law, including (a) for medical reasons, including but not limited to pregnancy or anticipated pregnancy; (b) because of a sincerely held religious belief, practice or observance; (c) because of immunity to COVID-19; (d) because of the employee's agreement to submit to periodic COVID-19 testing at the Company's expense; or (e) because of the employee's agreement to utilize Company-provided personal protective equipment when in the presence of other employees or persons. Exemption statements submitted to the Company will be handled in accordance with applicable laws and regulations.

### **Requesting an Accommodation**

To request an accommodation or exemption for one of the above reasons, or any other reason provided by applicable law, please notify the Human Resources Department in writing at [hr@ksiautoparts.com](mailto:hr@ksiautoparts.com). When the Company receives notice from the employee or their representative of the need for an accommodation, the Company will engage in an interactive process, including any recommended by the employee's healthcare provider. Also, where appropriate, we may need an employee's permission to obtain additional information from their physician or other medical or rehabilitation professionals. All medical information received by the Company in connection with a request for accommodation will be treated as confidential. Finally, while the Company will consider any accommodation request, it reserves the right to offer its own accommodation to the extent permitted by applicable law.

Once the Company has made a determination as to the employee's request for an accommodation, the determination will be communicated to the employee as soon as is reasonably practicable and in accordance with applicable law.

Company in connection with a request for accommodation will be treated as confidential. Finally, while the Company will consider any accommodation request, it reserves the right to offer its own accommodation to the extent permitted by applicable law.

Once the Company has made a determination as to the employee's request for an accommodation, the determination will be communicated to the employee as soon as is reasonably practicable and in accordance with applicable law.

## **Procedures**

### **Overview and General Information**

All employees must be fully vaccinated no later than **September 2, 2022**.

To be fully vaccinated by September 2, 2022, an employee must:

- Obtain one dose of a single dose vaccine or two doses of a single dose vaccine;
- Obtain a booster dose of either a single or two dose vaccine as soon as they are eligible to do so pursuant to CDC guidelines as detailed below: and,
- Obtain a booster dose within the following time frames following their receipt of primary vaccination:
  - No later than 6 months after the completion of the primary series of the Moderna vaccine;
  - No later than 5 months after the completion of the primary series of the Pfizer vaccine; and
  - No later than 2 months after the completion of their receipt of the Johnson & Johnson's vaccine.

Employees will be considered not fully vaccinated if they do not meet each and every element of the above definition of "fully vaccinated," including if they have received (i) only one dose of a two-dose vaccine or (ii) one dose of a one dose vaccine, or two doses of a two-dose vaccine, but have not received a booster dose of a COVID-19 vaccine. Employees who are not fully vaccinated and are unable to obtain a booster dose (whether due to medical or religious reasons, ineligibility due to the date of initial vaccination, or due to treatment for COVID-19 with monoclonal antibodies or convalescent plasma within the past 90 days, or some other legitimate reason) should contact the Human Resources Department in writing at **hr@ksiautoparts.com**.

### **Vaccination Status and Acceptable Forms of Proof of Vaccination**

All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted via **e-mail at hr@ksiautoparts.com**.

Acceptable proof of vaccination status is:

- The record of immunization from a healthcare provider or pharmacy
- A copy of the COVID-19 Vaccination Record Card

- A copy of medical records documenting the vaccination
- A copy of immunization records from a public health, state, or tribal immunization information system; or
- A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) administering the vaccine(s)

## **New Hires**

All new employees are required to comply with the vaccination 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.

## **Anti-Retaliation**

The Company absolutely prohibits retaliation, which includes threatening or taking an adverse action against an individual, for, among other things, requesting an accommodation under this Policy. The Company will make every reasonable effort to stop retaliation immediately, to conduct an investigation of alleged acts of retaliation in a timely manner, to provide remedies to victims of retaliation, and to discipline the perpetrators of retaliation as deemed appropriate in the Company's sole discretion.

Nothing in this Policy is intended to interfere with or abridge an employee's right to collectively bargain and participate in concerted activities to improve working conditions, or to prohibit an employee from exercising any of their rights under the Section 7 or any other provision of the National Labor Relations Act, or under any other applicable federal, state, or local law. Further, nothing in this Policy is intended to interfere with any employee's status as an "at will" employee.

If you have questions regarding this Policy or believe that you have been treated in a manner that is inconsistent with this Policy, please notify Human Resources immediately at **908.754.7154 x 2188**.

**Policy Adoption Date**  
May 10, 2021

**Policy Amendment Date**  
June 29, 2022