

COVID-19 Vaccinations - Visitors

POLICY DOCUMENT

1. PURPOSE

- 1.1 Pickles Auctions Pty. Limited ACN 159 360 522 (Pickles) has an obligation to provide a work environment without risks to health and safety to the extent reasonably practicable, which includes eliminating or minimising the risks associated with exposure to communicable diseases that may be avoidable by vaccination. Pickles also has a responsibility to ensure, so far as is reasonably practicable, that it is protecting the health and wellbeing of Pickles, employees, contractors, consultants, suppliers, customers (buyers and vendors), and members of the public who interact with it.
- 1.2 The occurrence of communicable diseases, such as SARS-CoV-2 (COVID-19), within the community is unpredictable. As such, supporting employees to be vaccinated against communicable diseases, such as COVID-19, is a critical strategy in providing a safe work environment.
- 1.3 Pickles has an obligation to comply with all relevant legal and regulatory obligations in Australia, including but not limited to public health orders.
- 1.4 This policy aims to assist Pickles to assess and manage exposure to such diseases, and therefore meet its legal and social obligations.
- 1.5 This policy is not contractual in nature and does not confer any contractual entitlements on Visitors nor does it impose any contractual obligations on Pickles.

2. APPLICATION

- 2.1 This policy applies to Pickles and its associated entities.
- 2.2 This policy applies to all external contractors, consultants (and their employees, contractors and consultants performing work for Pickles) suppliers, customers (buyers and vendors), members of the public who interact with Pickles in Australia (together Visitors). Pickles reserves the right to alter and update the coverage of this policy at any time.
- 2.3 This policy is considered to be a lawful and reasonable direction for reasons which include:
 - (a) the likelihood of exposure to COVID-19 occurring. This includes the extent of community transmission of COVID-19 in many areas across Australia;
 - (b) the degree of harm that might result from that exposure;
 - (c) the availability, effectiveness and suitability of ways to eliminate, or otherwise minimise, that exposure, including wearing masks and social distancing;

- (d) the effectiveness of vaccines in reducing the risk of transmission or serious illness;
- (e) vaccine availability;
- (f) laws and regulations applying, including public health orders;
- (g) the nature of each workplace;
- (h) whether Visitors have a legitimate reason for not being vaccinated (for example, a medical contraindication).

2.4 This policy commences application from 1 November 2021 onwards until revoked, amended or replaced.

3. GOVERNANCE AND CONSULTATION

3.1 This policy may be reviewed and updated at any time. This will ensure that Pickles can continue to provide a safe and healthy work environment and comply with federal or state and territory government health advice as it evolves.

3.2 Any questions or concerns in relation to this policy can be directed to Chris Avramis at chris.avramis@pickles.com.au

4. POLICY DETAILS

4.1 Vaccination has been identified as an effective measure to mitigate the effects of COVID-19.

4.2 Pickles considers that there is significant occupational risk of exposure to COVID-19 in internal and external stakeholders who frequent in its workplace and premises.

4.3 To attend any Pickles location at a branch or office and includes a meeting, function or event held at a third party location (Pickles Location), Visitors to Pickles, will be required to have a full course of a COVID-19 vaccination by the date applicable to the relevant state in the table below which the Pickles Location is situated, where no medical exemption applies, unless otherwise required or recommended by the relevant state or territory government or health authority that a Visitor be vaccinated earlier.

New South Wales: 1 December 2021
Victoria: 1 December 2021
Queensland 1 February 2022
Australian Capital Territory: 1 February 2022
Tasmania: 1 February 2022
Northern Territory: 1 January 2022
South Australia: 1 February 2022
Western Australia: 1 February 2022
(Compliance Date)

4.4 Unless covered by an exemption to our satisfaction, all Visitors will, at all times:

- (a) comply with any public health orders that may apply to them;

- (b) ensure that they have received a full course of an Australian government Department of Health approved vaccination for COVID-19 as soon as practicable after the Visitors becomes eligible for vaccination in accordance with the directions set by the relevant state or territory government or health authority in which the Visitors ordinarily reside or work, and by no later than the relevant Compliance Date set out above;
- (c) ensure that they have received any additional COVID-19 vaccination on an annual basis, or otherwise as required or recommended by the relevant state or territory government or health authority in which the Visitors ordinarily reside or work and by no later than 4 weeks after the Visitors becomes eligible to receive the additional COVID-19 vaccination; and
- (d) provide Pickles with sufficient evidence, to its satisfaction, of a full course of a COVID-19 vaccination and any additional vaccination including any boosters required in the future from:
 - (i) an Australian federal, or state or territory, government health authority;
 - (ii) an Australian Medical Practitioner registered with the Australian Health Practitioner Regulation Agency; or
 - (iii) an authorised government or health authority in the country in which the Visitors received the vaccination as verified by Pickles to its complete satisfaction,

to certify that the Visitors has received a full course of an approved vaccination for COVID-19 or such other evidence as Pickles may direct that it requires.

- 4.5 For the avoidance of doubt, the ongoing obligation of Visitors to undertake a full course of a COVID-19 vaccination will extend to any requirement which may arise as a consequence of a booster or alternate form of vaccination recommended by an Australian state or territory government health authority, or the federal government health authorities, to mitigate the effects of a variant of COVID-19 which was not known or identified at the time of issue of this policy.
- 4.6 In addition to the requirements outlined above, all Visitors must comply with all other directions, protocols or policies that Pickles may issue, implement or amend with respect to COVID-19 safety in the workplace, and work health and safety more generally.
- 4.7 Any Visitors not adhering to the requirements set out above and in this policy (without reasonable excuse) may be refused entry to a Pickles Location.
- 4.8 Any Visitors who are not vaccinated against COVID-19 in accordance with the requirements set out above will not be able to attend any Pickles Location. Unvaccinated Visitors can put Visitors, Pickles employees, contractors, consultants, suppliers, customers (buyers and vendors), members of the public who interact with Pickles at risk and therefore cannot attend a Pickles Location if unvaccinated.

5. RESPONSIBILITIES

5.1 Visitors

- (a) All Visitors who are required to be vaccinated must be able to demonstrate that they have received two doses of an approved COVID-19 vaccination by no later than the relevant Compliance Date set out above.
- (b) Visitors must provide appropriate documentary evidence of their COVID-19 vaccination status upon request by a Pickles employee by no later than the relevant Compliance Date set out. Failure to comply with this request will result in entry to a Pickles Location being refused.
- (c) Visitors who are displaying COVID-19 symptoms (including but not limited to fever, dry cough, tiredness, aches and pains, sore throat, diarrhoea, headache, loss of taste or smell, or difficulty breathing or shortness of breath), must not attend a Pickles Location until the symptoms cease.

6. EXEMPTIONS

6.1 Grounds for Granting an Exemption

- (a) Visitors may request an exemption from this policy by submitting a report from an appropriately qualified medical practitioner detailing their specific medical contraindication to all COVID-19 vaccinations available to the Australian public.
- (b) A contraindication is defined as a condition in a recipient that increases the risk of a serious adverse reaction which is recognised by the manufacturer of the vaccine. A contraindication to only one or a proportion of vaccinations available to the Australian public is not considered sufficient justification for granting an exemption.
- (c) Any reason other than a specific medical contraindication may not be considered sufficient justification for granting an exemption.
- (d) Where Visitors do not have an approved exemption and refuse or otherwise fail to comply with the requirements of this Policy, the Visitors will be considered to be non-compliant with the terms of this policy and may be refused entry to a Pickles Location.

7. PRIVACY

7.1 Pickles respects the privacy of its Visitors and seeks to comply with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth).

7.2 Visitors vaccination information will be collected:

- (a) where it is a requirement under this policy for the Visitors to demonstrate that they have been vaccinated against COVID-19;
- (b) where it is a requirement under a specific government public health order or direction for the Visitors to demonstrate that they have been vaccinated against COVID-19; and
- (c) where the Visitors voluntarily share or consent to the collection of their vaccination information.

- 7.3 Without limiting the use that may be made of Visitor records, where Visitors provide details of their vaccination status, that Visitors consent to Pickles disclosing their vaccination status to:
- (a) Pickles employees with health and safety responsibilities who have a reasonable business requirement for the information, including managers with responsibilities under this policy;
 - (b) management where there are business requirements for doing so;
 - (c) other third parties such as customers, clients or contractors who require the vaccination status of Visitors prior to Pickles being granted entry into premises owned by a third party; and
 - (d) internal or external legal representatives for the purpose of obtaining legal advice.
- 7.4 Visitors vaccination status will not be shared with entities outside Australia.
- 7.5 The Pickles Privacy Policy can be accessed via the Pickles website and sets out the process for Visitors to access or correct information held by Pickles or to make a complaint about Pickles' handling of their personal information.

VERSION CONTROL

VERSION	DATE	REVISED BY	DESCRIPTION	NEXT REVIEW
1	01/11/2021	Legal	Creation of Policy	01/11/2023
2	01/12/2021	Legal	Policy Review	01/12/2022
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