

CONTRACTOR COVID-19 VACCINATION POLICY INFORMATION SHEET

The health and safety of our employees, our contractors and our customers is a priority for BC Hydro. We're committed to taking precautions to ensure the continued safety of its workers and workplaces and to minimize the risk of COVID-19 transmission. Information and guidance from the BC Centre for Disease Control advises that vaccines are the best way to protect against severe illness, hospitalization and death from COVID-19, and reduce the risk of transmitting the virus to others.

Effective January 10, 2022, as part of its contractor Safety Standards, BC Hydro requires the workers and subcontractors' workers of its contractors and Suppliers, working at BC Hydro workplaces¹ to be fully vaccinated against COVID-19. Fully vaccinated is defined as having received a complete vaccine series of a COVID-19 vaccine accepted by the BC Centre for Disease Control.

WHAT WE REQUIRE OF CONTRACTORS

A contractor is any company, organization or supplier engaged by BC Hydro to provide services or supplies. Contractors should read the Policy [BC Hydro contractor COVID-19 Vaccination Policy](#).

Contractor companies, not individuals, are responsible for complying with this policy. It is the Contractor's responsibility to communicate the requirements of the Vaccination Policy to its workers and subcontractors, to confirm the vaccination status of its workers and subcontractors to ensure compliance, and to maintain records of its related processes

Determine if your work Qualifies as a Listed Policy Exemption

Policy exemptions are situations where the policy does not apply, based solely on the types of work or workplaces listed in the policy. A Contractor may be fully exempt from the policy if their work falls entirely within the listed exemptions from the Policy. Alternatively a contractor may not be fully exempt from the policy, but could have exempt worksites (such as their own offices, or isolated work locations).

After reviewing the policy, if you believe some or all of your work for BC Hydro falls entirely within a policy exemption you must contact your BC Hydro contract representative who will confirm your understanding. If BC Hydro does not confirm that all of your work is exempt from the policy you are required to submit a signed Acknowledgement Form. If you have not submitted a signed Acknowledgement Form you will not be authorized to enter a BC Hydro workplace as of January 10, 2022.

Be Prepared to Access Third Party Land and Facilities

Independent of this policy, contractors that need to travel through or access third party lands or facilities, including customer properties and Indigenous communities, while doing work for BC Hydro are expected to provide evidence of their workers and their subcontractors' workers COVID-19 vaccination status, including proof of vaccination when requested by third parties to do so. Contractors will be responsible for any delays resulting from refusals of access for failing to provide such proof.

Acknowledgement Form

Existing and new contractors and Suppliers (not individual workers) are required to submit a signed acknowledgement of the Policy prior to their workers or subcontractors' workers attending any BC Hydro workplace as of January 10, 2022, unless their work for BC Hydro falls entirely within an exemption from the Policy. Only one signed Acknowledgement Form is required per contractor, even when they have multiple contracts; contractors will be asked to provide their unique

¹ BC Hydro workplace is any worksite, location or facility where work is performed for or on behalf of BC Hydro.

Vendor ID number when submitting. Contractors that are not fully exempt from the Policy and have not submitted a signed Acknowledgement Form are not authorized to enter a BC Hydro workplace as of January 10, 2022. Contractors should submit a signed Acknowledgement Form even if they plan to make a specific exception request for a specific workplace, or for a specific worker to facilitate the contractor's workplace accommodation for that worker.

It is the contractor's responsibility to communicate the requirements of the Vaccination Policy to its workers and subcontractors and to confirm the vaccination status of all its workers and subcontractors' workers to ensure compliance.

Steps to submit your Acknowledgement Form

- Download, complete and sign the [BC Hydro Contractor COVID-19 Vaccination Policy Acknowledgement Form](#);
- Submit your completed form by one of the two options below:
 - by using the email template in the attachment column after downloading this sheet or
 - Send email to ContractorCOVIDCompliance@bchydro.com
 - with the subject line [BC Hydro Supplier Notice: COVID-19 Vaccination Policy_<Type in Your Company's Name here>_<Type in Your Company's ID with BC Hydro here if any>]
 - Attach your signed acknowledgement form, and copy the following table of identifying information into the email and complete it.

	Complete all fields
1. Contractor or Supplier Name	
2. Vendor ID with BCH	
3. BC Hydro Representative Name	
4. Signed Acknowledgement Form Attached? Reply Yes/No	

- To minimize risk of delay, contractors are asked to submit their signed Acknowledgement as soon as possible and preferably at least 30 days prior to their workers' or subcontractors' first scheduled attendance at a BC Hydro workplace. For contractors requiring workers attend a BC Hydro workplace as of January 10, 2022 we recommend submission of your signed Acknowledgement Form by December 10, 2021.

Contractor Confirmation of Vaccination Status, Record Keeping and Audit

For the purposes of the Policy, a contractor must have an established process to confirm and record the vaccination status of its workers and its subcontractors' workers, and should include a process to undertake compliance checks that could include review of an acceptable proof of vaccination. Acceptable proof of vaccination is a digital or paper BC Vaccine Card, Canadian COVID-19 Proof of Vaccination, or equivalent government issued COVID-19 vaccination card issued in the province or country of residence of the worker together with government-issued photo identification.

A representative of BC Hydro may conduct compliance checks or random audits of contractors to ensure compliance with the policy. During an audit BC Hydro may ask a contractor to provide evidence of their process to confirm and record the vaccination status of its workers and its subcontractors' workers and may be asked to provide such evidence or records as are reasonably necessary to establish the contractor's compliance with the Policy. This may include to provide proof of vaccination for a worker who has attended a BC Hydro workplace after January 10, 2022. BC Hydro is authorized to collect this information under section 26(c) of the Freedom of Information and Protection of Privacy Act. If you have questions about this collection, you may contact ContractorCOVIDCompliance@bchydro.com.

EXCEPTION REQUESTS

Policy exceptions are situations where the policy *does apply* to the Contractor (and an Acknowledgement Form is required), however BC Hydro may have approved either a specific workplace / work site exception, or an exception for any individual workers who have an accepted workplace accommodation. Contractors must submit a Policy Acknowledgement Form. They may then request an *exception*. BC Hydro may consider and grant exceptions from the requirements of the Policy at its sole discretion and will provide its decision in writing. Approved exceptions may also include limitations, such as time limits, or special conditions.

BC Hydro expects to grant exceptions from this policy in exceptional circumstances only, and not generally for reasons of

personal preference, opinion, philosophy, a belief or opinion about the legality of BC Hydro's vaccination policy, or a personal belief about COVID-19 or vaccination.

Workplace-specific exceptions – these may include an exception to facilitate emergency or highly specialized work.

Worker BC Hydro may also grant a worker specific exception to facilitate a contractor's workplace accommodation for an individual who cannot be fully vaccinated by reason of a protected ground under the *BC Human Rights Code*. If an exception is granted, BC Hydro may include limitations or conditions deemed necessary to mitigate any operational or health and safety risks associated with the exception. Until a written decision is rendered by BC Hydro relevant to a request for an exception, the contractor must comply with the Policy and not deploy any worker(s) covered by the request to any BC Hydro workplace if they are not fully vaccinated.

BC Hydro recognizes that contractors may have a duty to accommodate individual workers who are unable to get fully vaccinated due to characteristics protected under the *BC Human Rights Code*. It is the contractors' responsibility to have in place processes for managing workplace accommodation requests from its own workers, and for attempting to accommodate their workers in a manner that complies with this Policy, including deployment of the worker to a non-BC Hydro workplace. If a contractor cannot accommodate a worker who is unable to be fully vaccinated due to protected characteristics, the contractor may request an exception from the Policy to facilitate a workplace accommodation. BC Hydro will endeavor to facilitate contractors' worker accommodation efforts where reasonable.

Steps to submit an Exception Request (submissions open on November 22, 2021)

- Contractors submit Exception Requests directly (not to their BC Hydro representative)
- Requests should include the following information:
 - As relevant to the request: contract number, name of the BC Hydro contract representative, name and email of the contractor's representative, worksite name
 - Details of and reason for the request:
 - Requests for exception may be made for a) a specific location or workplace, or b) for an individual worker to facilitate a workplace accommodation accepted by the contractor in accordance with the BC Human Rights Code.
 - If the request is for a workplace accommodation provide the name of the individual or subcontractor for whom the exception is being sought, and the contractor's proposal for accommodation and how BC Hydro is being asked to facilitate it. Do not provide personal medical information with the request.
 - Proposed mitigation measures associated with the request
 - The contractor must provide a proposal for mitigating any operational, health and safety risks to BC Hydro or its employees, or the workers of other contractors, associated with the exception request and any additional information reasonably necessary for BC Hydro to understand and assess the request.
- Follow **Exception Request** submission instructions at [Safety Information for Contractors](#) and submit a [completed Exception Request](#) as soon as possible, preferably at least 30 days prior to the relevant workers' first scheduled attendance at a BC Hydro workplace.
- Contact ContractorCOVIDExceptions@bchydro.com for assistance if you don't have a Hydro Extranet account to access the [Request for Exception form](#).
- You may be contacted to provide further information.
- Until a written decision is rendered by BC Hydro relevant to a request for an exception, the contractor must comply with the Policy and not deploy any worker(s) covered by the request to any BC Hydro workplace if they are not fully vaccinated.

QUESTIONS AND CONTACT INFORMATION

Please refer to the FREQUENTLY ASKED QUESTIONS section for more information. Please contact your BC Hydro contract representative with further questions.

POLICY APPLICATION SCENARIOS

These are illustrative scenarios only. After reviewing the policy, if you believe your work for BC Hydro falls entirely within a listed exemption from the Policy please contact your BC Hydro contract representative to confirm your understanding.

Scenario	Vaccine Policy Application
A contractor performs all work at their own offices and never needs to come to a BC Hydro workplace.	The contractor is exempt from the Contractor Vaccination Policy because the work meets the exemption for work solely at contractor offices. The contractor is not required to submit an Acknowledgement Form. They will not be permitted entry to a BC Hydro workplace as a contractor.
A contractor performs vegetation management services in distribution or transmission corridors. The contractor's management meets regularly with BC Hydro contract representatives at BC Hydro offices. The contractor's crews do not work at BC Hydro facilities or interact with BC Hydro staff.	The Contractor Vaccination Policy applies to the contractor because they access BC Hydro facilities and interact with BC Hydro staff. Crew members solely performing work that fully meets the exemption for isolated work ² may be exempt from policy requirements. The contractor must confirm with their BC Hydro contract representative if their work areas fully meet the isolated work definition. The contractor is required to submit an Acknowledgement Form.
A contractor provides environmental monitoring along rivers or reservoirs, but does not directly interact with BC Hydro staff, other BC Hydro contractors, customers or community members.	The contractor is exempt from the contractor Vaccination Policy because the work meets the exemption for isolated work. The contractor is not required to submit an Acknowledgement Form. They will not be permitted entry to a BC Hydro workplace as a contractor.
A courier company regularly delivers materials or packages to various BC Hydro work sites.	The courier is exempt from the contractor Vaccination Policy because they deliver or pick up packages only; Couriers must follow all applicable visitor requirements when entering BC Hydro facilities.
A BC Hydro supplier has a contract to supply, deliver and install equipment at a BC Hydro facility.	The contractor Vaccination Policy applies to the contractor because they access BC Hydro facilities and interact with BC Hydro staff. Some individual workers may be exempt from policy requirements if they do not enter BC Hydro facilities or interact with BC Hydro staff. Only fully vaccinated workers can attend meetings at BC Hydro offices. The contractor is required to submit an Acknowledgement Form.
A contractor has a contract to supply coffee, stationary or similar office services at BC Hydro offices.	The contractor Vaccination Policy applies to the contractor because they access BC Hydro facilities and interact with BC Hydro staff. The contractor is required to submit an Acknowledgement Form.
A contractor performs snow removal or landscaping services at a BC Hydro office.	The contractor Vaccination Policy applies to the contractor because they access BC Hydro facilities and interact with BC Hydro staff. The contractor is required to submit an Acknowledgement Form.
A contractor has hired an Indigenous company as a subcontractor to undertake cultural monitoring at a BC Hydro construction work site.	Unless the work qualifies as exempt as an isolated location, the contractor Vaccination Policy applies to the contractor and their subcontractor because they access BC Hydro facilities and interact with BC Hydro staff and potentially other BC Hydro contractors. The contractor is required to submit an Acknowledgement Form.
A contractor is hired to do customer meter installations. They do not work from a BC Hydro facility or yard.	The contractor Vaccination Policy applies to the contractor because they will work with BC Hydro customers during their work. The contractor is required to submit an Acknowledgement Form.
A contractor is aware that some of their staff will not be fully vaccinated by January 10, 2022. They need to enter a BC Hydro workplace to do their work. They plan to request an exception from BC Hydro so that their existing staff can continue to work on the BC Hydro work.	The contractor Vaccination Policy applies to the contractor because they access a BC Hydro workplace. The contractor is required to submit an Acknowledgement Form. A contractor should only apply for an exception for any worker if they have already accepted a legitimate request for a workplace accommodation, and they have made efforts to and are unable to replace that worker on BC Hydro work.

² Isolated work is work that both is in an isolated location that is not a BC Hydro facility, and does not require work directly with BC Hydro employees, other BC Hydro contractors, customers or community members

FREQUENTLY ASKED QUESTIONS

Is your isolated work, or delivery, exempt?

- If your work is alongside other BC Hydro employees or contractors it is not exempt, which includes attending joint tailboards and relying on shared services including first aid, washrooms, etc.)
- For delivery services, if the driver attends a tailboard, relies on BC Hydro facilities or services (first aid, washroom, etc.) while on site, or works alongside others during the delivery / removal, or provides training services it is not exempt.

What is the definition of fully vaccinated?

We rely on the BC Centre for Disease Control to define which vaccines are accepted in BC and what full vaccination is: [See Vaccines accepted as part of a complete immunization record in BC.](#)

My company has not yet submitted its Policy Acknowledgement Form – can I still come onto a BC Hydro workplace?

If your company has not yet submitted a Policy Acknowledgement Form you are not permitted to enter a BC Hydro workplace until they have done so.

If your company has submitted their form and it is pending review, their employees may enter temporarily as a Visitor by showing their individual Proof of Vaccination to the site host until the submission is confirmed. If it is not valid the employees will no longer be permitted to enter a BC Hydro workplace until a valid submission is received.

My company was deemed exempt from the Policy. Can any employees attend a BC Hydro workplace for a site visit or meeting?

Yes, for occasional visits employees can be hosted on site as Visitors. All attendees will be required to show their valid Proof of Vaccination and Identification to the security or site host prior to entry.

Do contractors employees have to show Proof of Vaccination at the site?

No. Because contractors are required to submit a signed policy acknowledgement form their individual employees do not need to show their personal proof of vaccination status to BC Hydro employees. If a contractor is exempt from the policy, and has not submitted a Policy Acknowledgement Form, their employees will only be allowed entry to BC Hydro workplaces as a visitor and will be required to show their valid Proof of COVID-19 Vaccination and Identification to the security or site host prior to entry.