Mandatory Employee COVID-19 Vaccination Policy

In response to the COVID-19 pandemic, Anschutz Entertainment Group, Inc., on behalf of itself and its affiliates (collectively, the “Company”) is implementing a mandatory vaccination policy, subject to the exceptions set out in this policy. This policy is based on the most recent guidance from the Centers for Disease Control and Prevention (“CDC”), the Equal Employment Opportunity Commission (“EEOC”), and other state and federal agencies, and complies with all applicable federal, state, and local laws. Compliance with this policy is a condition of employment for Covered Persons (as defined below) as of the Implementation Date (as defined below). Please read this policy carefully.

Covered Persons

This policy, where allowed by law, applies to the following:

- all full and part-time employees and non-employee contracted staff who work in Company offices;
- all AEG Presents full and part-time employees, including event-based personnel who work outside the office.

Vaccination Requirements

To prevent the infection and spread of COVID-19 in the workplace, protect our workforce from serious illness and business disruptions, and as an integral part of its public health and safety measures, the Company requires Covered Persons to be fully vaccinated against COVID-19, unless the Company has granted an exemption under this policy.

New hires must present proof that they are fully vaccinated against COVID-19 disease or basis for an exemption after receiving an offer of employment but before their start date. The Company will provide additional time to meet this requirement on a case-by-case basis, but in no case may they start employment without receiving their first vaccination dose by their start date and must complete their course of vaccinations within 39 days of the start date, unless they have an approved exemption.

Covered Persons who fail to comply with the requirements of this policy will be subject to disciplinary measures, up to and including termination of employment.

Applicable Deadlines

The Implementation Date for this policy is October 4, 2021. All Covered Persons must be fully vaccinated or have an approved exemption by the Implementation Date.

The deadline to submit proof of full vaccination or a request for accommodation or exemption is September 20, 2021.

Approved COVID-19 Vaccines

Unless an exemption is granted under this policy, Covered Persons must be fully vaccinated with a COVID-19 vaccine for which (i) the U.S. Food and Drug Administration (“FDA”) has issued a license or an Emergency Use Authorization (“EUA”) or (ii) the World Health Organization under an Emergency Use Listing (“EUL”).
As of August 30, 2021, the FDA has determined that the following COVID-19 vaccines are safe and effective:

- the Pfizer-BioNTech COVID-19 vaccine (2 dose regimen) (FDA Licensed)
- the Moderna COVID-19 vaccine (2 dose regimen)
- the Johnson & Johnson (Janssen) COVID-19 vaccine (1 dose regimen)

An individual is considered “fully vaccinated” two weeks after the second dose of a two-dose vaccine (Moderna or Pfizer) or two weeks after a single-dose vaccine (Johnson & Johnson).

**Proof of Vaccination**

Covered Persons must submit proof of their vaccination by providing a copy of their CDC vaccination card (or foreign equivalent in the case of Covered Persons who received their vaccinations abroad), official documentation issued by a State vaccine registry, or an official medical record. Employees should not include any other medical or genetic information with their proof of vaccination. The Company will promptly return such proof of vaccination to Covered Persons and will keep retained vaccination information confidential as and to the extent required by law.

**Vaccine Administration**

Covered Persons are responsible for scheduling and obtaining all doses of an approved COVID-19 vaccine **no later than September 20, 2021**. Covered Persons may get vaccinated during their regularly scheduled work hours, if feasible.

**Accommodation and Exemption Requests**

**Disability or Medical Accommodation**

In accordance with the Company’s ADA and Disability Accommodations Policy, the Company provides reasonable accommodations, absent undue hardship, to qualified individuals with disabilities that enable them to perform their job duties. Reasonable accommodation may include appropriate adjustment or modifications of employer policies, including this policy.

Exemptions or short-term deferrals of the requirements of this policy for other medical reasons may be available on a case-by-case basis for conditions such as pregnancy, history of certain allergic reactions, and any other medical condition that is a contraindication to the COVID-19 vaccine, even if such conditions do not qualify as a disability under federal, state, or local law.

The Company will engage in an interactive dialogue with you to determine whether an exemption is appropriate and can be granted without imposing an undue hardship on Company operations or posing a direct threat to you or others in the workplace. However, the Company reserves the right to take any necessary and appropriate steps, including imposing alternative COVID-19 prevention measures, to ensure that the individual does not pose a direct threat to the health or safety of others in the workplace.

If you believe you need an accommodation regarding this policy because of a disability or medical condition, you are responsible for requesting a reasonable accommodation as described below.
Religious Accommodation

The Company provides reasonable accommodations, absent undue hardship, to employees with sincerely held religious beliefs, observances, or practices that conflict with work requirements, including this policy.

If you believe you need an accommodation regarding this policy because of your sincerely held religious belief, you are responsible for requesting a reasonable accommodation as described below.

Interactive Process

The Company will engage in an interactive dialogue with you to determine the precise limitations of your ability to comply with this policy and explore potential reasonable accommodations that could overcome those limitations. The Company encourages employees to suggest specific reasonable accommodations. However, the Company is not required to make the specific accommodation requested and may provide an alternative effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the Company or posing a direct threat to you or others in the workplace.

How to Request an Accommodation or Exemption

You may request a reasonable accommodation or other exemption from this policy by completing the Company’s Request for Exemption from Vaccination Policy Form and returning it to your Human Resources Representative. The forms are available from your Human Resources Representative.

Determinations

The Company makes determinations about requested accommodations and exemptions on a case-by-case basis considering various factors and based on an individualized assessment in each situation. The Company strives to make these determinations expeditiously. The Company will make such determinations in a fair and nondiscriminatory manner and will inform you after we make a determination. If you have any questions about an accommodation or exemption request you made, please contact your Human Resources Representative.

Alternate COVID-19 Prevention Measures / Continued Testing for Approved Exemptions

Covered Persons who are granted an exemption or deferral under this policy, or whose request for such an exemption/deferral is pending, must continue to comply with the Company’s 72 hour COVID-19 testing requirement for site access, as well as any other safety practices or requirements specified by the Company. For more information, contact your Human Resources Representative.

Continued Applicability of Other Infection Control Policies and Protocols

This policy is a key part of our overall strategy and commitment to maintaining a safe and healthy workplace in light of the COVID-19 pandemic. This policy is designed for use together with, and not as a substitute for, other COVID-19 prevention measures, including the Company’s Workplace Re-Opening Policies and Procedures, venue specific policies and guidance, and any applicable public health or safety orders in a particular jurisdiction. Company policies are intended as the minimum requirements for our employees and understand that there may be additional requirements and restrictions imposed on certain event workers by professional sports leagues, promoters, performers or artists.
GINA Safe Harbor

The Genetic Information Nondiscrimination Act of 2008 ("GINA") prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we ask that you not provide any genetic information when responding to this request for medical information.

“Genetic information,” as defined by GINA, includes:

- An individual’s family medical history.
- The results of an individual’s or family member’s genetic tests.
- The fact that an individual or an individual’s family member sought or received genetic services.
- Genetic information of a fetus carried by an individual or an individual’s family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

Policy Administration and Questions

If you have any questions about this policy or about health and safety issues that are not addressed in this policy, please contact your Human Resources Representative.

Policy Modification

Government and public health guidelines and restrictions and business and industry best practices regarding COVID-19 and COVID-19 vaccines are changing rapidly as new information becomes available and further research is conducted. The Company reserves the right to modify this policy at any time in its sole discretion to adapt to changing circumstances and business needs, consistent with its commitment to maintaining a safe and healthy workplace.

Enforcement and Non-Retaliation

Failure to comply with or enforce this policy may result in discipline, up to and including termination of employment.

The Company prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of this policy or any other health and safety concern. Employees also have the right to report work-related injuries and illnesses, and the Company will not discharge or discriminate or otherwise retaliate against employees for reporting work-related injuries or illnesses or good faith health and safety concerns.