GUIDANCE FOR COVID-19 PROGRAM

CONTENTS

Overview

The impact of COVID-19 on the health of Americans is not yet fully known. Reported illness ranges from very mild (some people have no symptoms) to severe illness that may result in death. Certain groups, including people aged 65 or older and those with serious underlying medical conditions, such as heart or lung disease or diabetes, are at higher risk of hospitalization and serious complications. Transmission is most likely when people are in close contact with an infected person, even if that person is a-symptomatic or has not yet developed symptoms.

Primary Goal:
Prevent an outbreak of COVID-19 in the workplace.

Precaution:
We only control the environment within our Business Space. Our success in preventing an outbreak will be related to our ability to implement a plan.

Precise information about the number and rates of COVID-19 by industry or occupational groups, including among critical infrastructure workers, is not currently available. There have been multiple outbreaks in a range of workplaces and office areas, indicating that workers are at risk of acquiring or transmitting COVID-19 infection.

As stay-at-home orders are modified, it is essential that all possible steps be taken to ensure the safety of all employees and visitors.

Key prevention practices include:
- ✓ physical distancing to the maximum extent possible,
- ✓ use of face coverings by employees and visitors,
- ✓ frequent handwashing and regular cleaning and disinfection,
- ✓ training employees on these and other elements of the COVID-19 prevention plan.

In addition, it will be critical to have in place appropriate contact tracing processes to identify new cases of illness in workplaces and, when they are identified, to intervene quickly and work with public health authorities to halt the spread of the virus.

Purpose

This document provides guidance for {Company} to support a safe, clean environment for employees and visitors. The guidance is not intended to revoke or repeal any employee rights, either statutory, regulatory or collectively bargained, and is not exhaustive, as it does not include county health orders, nor is it a substitute for any existing safety and health-related regulatory requirements such as those of OSHA. Stay current on changes to public health guidance and state/local orders, as the COVID-19 situation continues.

Definitions

Business Areas: Office locations (owned or leased) within the controlled area (footprint) of the company and exclusively used for and by company employees.

Common Areas: Any areas used by company personnel either within the company-controlled footprint, shared space with other companies or common space used to access company locations. These areas include any space in which there is a potential for exposure to COVID-19 by clients, contractors, or visitors

not under the control of the company. These areas include but are not limited to spaces within the business areas such as the lobby, waiting rooms, conference rooms, designated offices, delivery zones, mechanical rooms, or other similar service areas. These common areas can include any area in or around the building but outside of the company space that is available for occupancy by the general public such as building lobbies, security zones, cafeterias and parking structures.

Employer Visitor: A contracted employee who is visiting the company facility or company project on company business.

Non-Employee Visitor: Non-company personnel who are not covered by a site-specific contractual agreement to visit or perform specific activities in an active area of the job site. This may include vendors, clients, client representatives or employees of local, state, or federal regulatory agencies.

Contractor: Any person or employee, who is not employed by Company or an affiliate, and who is covered by a site-specific contractual agreement to perform specific work activities at a Company facility.

Visitor: A general term used in this document to describe a client, contractor, employee visitor, or non-employee visitor.

Individual Employee Guidance

Employees and visitors are urged to follow the most recent recommendations available. The Centers for Disease Control and Prevention and the local Department of Health and Human Services contain a wealth of material on all aspects of the developing health crisis, from communication resources and travel information to tips on how to protect your community.

> *Caution should always be taken to ensure the safety of all employee to visitor interactions. Use of protective equipment and social distancing shall always be enforced. Any exceptions require the approval of senior management or designee.*

At a minimum, employees should practice preventive actions, including regular handwashing, avoiding face touching, and practicing social distancing. This is particularly important in offices with older adults and individuals with underlying chronic medical conditions, who are at a higher risk of developing complications from COVID-19.

In an effort to change the course of the virus, health officials are suggesting that individuals avoid large public gatherings, adhere to spacing requirements in the workplace, and maintain enough distance between others to reduce the risk of exposure. {Company} has adopted these best business practices at all our locations.

Employer Guidance

The managers and supervisors shall be educated on measures designed to mitigate the impact of COVID-19. While employees are responsible for their own office space, the employer is tasked with the maintenance and management of the business areas and common areas. It is thus advisable for the employer to consider taking preventative action to address the spread of COVID-19 in and around the company's area of influence and usage.

Appendices to this Plan

COVID-19 How Long Does It Live	General Cleaning Recommendations
COVID-19 Medical Policy	How To-Bleach Solutions for Disinfecting
COVID-19 Incident Investigation Form	Pandemic Support to Employees
COVID-19 Case Analysis Checklist	Return to Work Form
COVID-19 Return After Illness	Social Distance Protocol

Site Specific Plan

Manager Responsibility

- Establish a worksite-specific COVID-19 prevention plan, perform a comprehensive risk assessment of all work areas, and designate a person Safety Control Officer (SCO) at each location to implement the plan.

- Identify contact information for the local health department where the building is located for communicating information about COVID-19 outbreaks among employees.

- Regularly evaluate the workplace for compliance with the plan and document and correct deficiencies identified.

SCO Responsibilities

Assign a COVID-19 Safety Compliance Officer (SCO) to each business location and ensure the SCO's name is posted on the Site-Specific Health and Safety Plan.

- Ensure implementation of all recommended safety and sanitation requirements regarding the COVID-19 virus.

- Provide verification of compliance to be made immediately available upon request by any County Official.

- Establish a daily screening protocol for arriving employees, to ensure that potentially infected staff do not enter the business location.

- Post the daily screening protocol for all employees and visitors at all entrances and exit to the location.

- Conduct emergency protocols in the event of an exposure or suspected exposure to COVID-19.

- Investigate any COVID-19 illness and determine if any work-related factors could have contributed to risk of infection. Update the plan as needed to prevent further cases.

- Identify close contacts (within six feet for 10 minutes or more) of an infected employee or visitor and take steps to isolate COVID-19 positive persons and close contacts.

- Train and communicate with employees and visitors on the plan.

- Adhere to the guidelines below. Failure to do so could result in workplace illnesses that may cause operations to be temporarily closed or limited.

Topics for Employee Training

Training is delivered in a variety of methods including verbal instruction, posters, flyers, policies, and procedures. **See Appendix Sections for more detail.**

- Information on COVID-19, how to prevent it from spreading, and which underlying health conditions may make individuals more susceptible to contracting the virus.

- Self-screening at home, including temperature and/or symptom checks using CDC guidelines.

- The importance of not coming to work if employees have a frequent cough, fever, difficulty breathing, chills, muscle pain, headache, sore throat, recent loss of taste or smell, or if they or someone they live with have been diagnosed with COVID-19.

- To seek medical attention if their symptoms become severe, including persistent pain or pressure in the chest, confusion, or bluish lips or face. Updates and further details are available on CDC's webpage

- The importance of frequent handwashing with soap and water, including scrubbing with soap for 20 seconds (or using hand sanitizer with at least 60% ethanol or 70% isopropanol when employees cannot get to a sink or handwashing station, per CDC guidelines).

- The importance of physical distancing, both at work and off work time (see Physical Distancing section below).

- Proper use of face coverings, including:

  o Face coverings do not always protect the wearer and are not personal protective equipment (PPE).

  o Face coverings can help protect people near the wearer, but do not replace the need for physical distancing and frequent handwashing.

  o Employees should wash or sanitize hands before and after using or adjusting face coverings.

  o Avoid touching eyes, nose, and mouth.

  o Face coverings should be washed after each shift.

Cleaning and Disinfecting Protocols

- Cleaning and disinfecting tasks should be carried out by individuals with a knowledge of cleaning supplies, systems and techniques specific to COVID-19. **See Appendix Section for more details.**

- Perform thorough cleaning in high traffic areas such as lobbies, front desk check-in counters, conference rooms, breakrooms, areas of ingress and egress including stairways, stairwells, handrails, and elevator controls. Frequently disinfect commonly used surfaces including door handles, facility interior locks, vending and ice machines, light switches, remote controls, phones, toilets, and handwashing facilities.

- Provide time for workers to implement cleaning practices before and after shifts. If cleaning is assigned to the worker, they must be compensated for that time.

- The SCO should review the frequency of the cleaning of any shared community area such as lobbies, conference rooms, breakrooms, etc. and how well the shared areas are being cleaned.

- The SCO should assess whether additional hand sanitizers, automated soap dispensers or disinfectant wipes need to be added to communal areas. The company may even consider shuttering common areas or amenities for a period of time on a temporary basis.

- Accordingly, all office locations and space should take appropriate measures to limit contact between the employees to the extent possible.

Additional Cleaning and Disinfecting Protocols for Facility Operations

- All reusable collateral, such as magazines or informational pamphlets should be removed from offices. Critical information should be provided as single-use collateral and/or electronically posted.

- In the event of a presumptive case of COVID-19, the common areas should be removed from service and quarantined. The office should not be returned to service until the case has been confirmed or cleared. In the event of a positive case, the office should only be returned to service after undergoing an enhanced sanitization protocol.

- Consider leaving common rooms that have been cleaned due to suspected or confirmed COVID-19 exposure vacant for 24 to 72 hours prior after cleaning.

- Install hand sanitizer dispensers, touchless whenever possible, at key employee and visitor entrances and contact areas such as conference rooms, lobbies, meeting spaces, and elevator landings.

- Equip workstations, desks, and help counters with proper sanitation products, including hand sanitizer and sanitizing wipes, and provide personal hand sanitizers to all employees and visitors.

- Ensure that sanitary facilities stay operational and stocked at all times and provide additional soap, paper towels, and hand sanitizer when needed.

- When choosing cleaning chemicals, employers should use products approved for use against COVID-19 on the Environmental Protection Agency (EPA)-approved list and follow product instructions. **See Appendix Section for more details.**

- Avoid sharing phones, tablets, laptops, desks, pens, other work supplies, or offices wherever possible. Never share PPE. Any shared tools and equipment should be sanitized before, during and after each shift or anytime the equipment is transferred to a new employee. This includes phones, radios, computers and other communication devices, payment terminals, kitchen implements, engineering tools, safety buttons, folios, cleaning equipment, keys, time clocks, and all other direct contact items.

Physical Distancing Guidelines

Physical distancing is NOT an option but a condition of employment and essential to business operations. An unexpected outbreak which exposes employees and/or visitors can be damaging to company image and brand. Every employee has the responsibility to adhere to these requirements and ensure they are enforced when meeting with all visitors. **See Appendix Section for more details.**

- Implement measures to ensure physical distancing of at least six feet between employees and others.

- Employee pre-shift meetings should be conducted virtually or in areas that allow for appropriate physical distancing between employees. Larger departments should stagger employee arrival times to minimize traffic volume in back of house corridors and service elevators.

- Stagger employee breaks, in compliance with wage and hour regulations, to maintain physical distancing protocols.

- Close breakrooms, use barriers, or increase distance between tables/chairs to separate workers and discourage congregating during breaks. Where possible, create outdoor break areas with shade covers and seating that ensures physical distancing.

- Redesign office spaces, cubicles, lobbies, security check-in areas, business centers and other spaces if possible, to ensure workspaces and visitor accommodations allow for at least six feet distancing.

- Discourage employees from congregating in high traffic areas such as bathrooms and hallways and establish directional hallways and passageways for foot traffic, if possible, to eliminate people from passing by one another.

- Limit the number of individuals riding in an elevator and ensure the use of face coverings. Use signage to communicate these requirements.

- Require employees to avoid handshakes and similar greetings that break physical distance.

- Eliminate person-to-person contact for delivery of goods to physical offices. Avoid touching others' pens and clipboards

Additional Physical Distancing Guidelines for Business Operations

- Employees should enter through doors that are designated as COVID-19 entrances. These entrances and exit points shall be cleaned on a predetermined schedule established by the SCO. Note: During any emergency, everyone shall use the nearest safe exit.

- If possible, visitors shall be allowed entrance into the area by appointment only through a door operated by an employee that is frequently handwashing and/or using proper hand sanitizer.

- Implement peak period queueing procedures, including a lobby greeter and having guests' queue outside to maintain at least six feet of physical distance between persons. Exceptions are for people who are either family members or cohabitants who normally congregate on a daily basis.

Business Operations

Business Operations will be altered in accordance with the ever-changing guidelines presented by regulatory and qualified informational sources. Any outbreak suspected or confirmed will alter business operations either permanently or temporarily.

Recovery Strategies

Recovery strategies may change at any time based on information provided by local, state and federal agencies and the changing conditions of the disease outbreak.

See Appendix Section for more details.

Facility, Equipment and Services

- Business functions will be recovered in priority sequence determined by Management.

- All communications concerning the response and recovery status will be approved by Management.

- Purchase and acquisition of equipment and supplies needed for the recovery effort will be coordinated through company management.

Returning employees

Employees returning to the company must be managed in small groups. Employees should be interviewed to determine their existing condition and fitness to return to work. The following questions, at a minimum, should be asked.

- Has the employee been in contact with anyone diagnosed with an infectious disease?

- Has the employee been in contact with anyone who demonstrated flu like symptoms but were never checked at a medical facility?

- Has the employee attended any events in the past 2 weeks where anyone was diagnosed with an infectious disease?

- Is the employee experiencing now or have they experienced flu like symptoms in the past 2 weeks?

Workspace

{COMPANY} is responsible for the safety and security of the **workplace**. Employees are responsible for the safety and security of their **workspace**. The workspace controlled by the employee shall be kept clear of all unessential objects and equipment. The more unnecessary clutter in the workspace represents more area that must be cleaned and sanitized in the event of a suspected or confirmed outbreak of COVID-19.

Employees control access into their assigned workspace by setting the standard by which other employees and visitors may enter. In workspaces that are isolated, such as hard walled offices, the employee may elect to use a mask or occupy the space unprotected. The employee also has the right to determine if other employees or visitors must don masks prior to entry.

Exceptions: If the company manager declares that masks are mandatory in the workplace on a temporary or permanent basis, all employees and visitors shall comply. Mandatory use of masks shall be in place whenever a suspected or confirmed case of COVID-19 has been identified in the office. Only the company manager can lift the mandate in accordance with the findings of the COVID-19 investigation.

Access Control

The only control the company can accurately maintain is the policies and procedures within the company boundaries. It must be assumed that all visitors who come to the office locations do not practice Social Distancing or use Personal Protective Equipment.

Vendors and contractors will assure the company that they have screened their employees and equipment to ensure that evidence of the infectious disease event is not present in their operations. Vendors and contractors may be required to provide proof of a plan as a condition for entrance into the facility and, more importantly, into the designated Business Area.

Visitor Access

All visitors shall be allowed access into the Business Office by invitation only.

Visitors are required to complete the health questionnaire and comply with the protective measures established for the office and the Common Area they will visit. Visitors such as customers, clients and client representatives shall be escorted to the appropriate meeting area and not left unattended.

The office shall be secured to prohibit walk-in visitors. A sign shall be posted on the door giving instructions to visitors on how to access the building.

All invited visitors shall be given a time to arrive. The visitor shall have a $\pm$ 5-minute window for arrival. Visitors who arrive early or late shall be encouraged to contact the office for permission to enter the office space.

Contractor Access

All contractors shall be allowed access into the Business Office by invitation or predetermined arraignment only.

Access into the Business Area by non-employees is limited to those contractors who provide services for the company. These groups are required to move directly to the location of service and may not freely roam the Business Area unescorted. The exception is the use of the restroom facilities.

All contractors are required to complete the health questionnaire and comply with the protective measures established for the office and the Common Area they will visit.

All invited contractors shall be given a time to arrive. They shall have a $\pm$ 5-minute window for arrival. Those who arrive early or late shall be encouraged to contact the office for permission to enter the office space.

Vendors

All vendors shall be allowed access into the Business Office by invitation or predetermined arraignment only. ***Exception is mail and package delivery services such as USPS, Fed Ex, Amazon, UPS.***

Access into the Business Area by vendor shall be approved on a case by case basis by the SCO or designee.

All vendors (excluding the exceptions mentioned above) are required to complete the health questionnaire and comply with the protective measures established for the office and the Common Area or Business Areas they will visit.

All invited contractors shall be given a time to arrive. They shall have a $\pm$ 5-minute window for arrival. Those who arrive early or late shall be encouraged to contact the office for permission to enter the office space.

Delivery of Materials, Supplies and Equipment

The SCO shall designate a location for package delivery and pickup. This area should be close to the entrance or preferably in a marked location outside the office door. A sign shall be posted indicating the instructions for drop off and pickup which includes how the vendor is to notify the company of arrival.

Emergency Management

The Senior Manager or designee is responsible for activating the infectious disease control plan when the disease is affecting employees and, in turn, the company's ability to maintain business operations. **See Appendix Section for more details.**

When to Seek Emergency Medical Attention

Look for emergency warning signs* for COVID-19. If someone is showing any of these signs, seek emergency medical care immediately

- Trouble breathing

- Persistent pain or pressure in the chest

- New confusion

- Inability to wake or stay awake

- Bluish lips or face

*This list is not all possible symptoms. Please call your medical provider for any other symptoms that are severe or concerning to you.

If victim is in distress and unable to function without assistance, call 911 or call ahead to your local emergency facility: Notify the operator that you are seeking care for someone who has or may have COVID-19.

Contact Tracing

Contact tracing must identify individuals who test positive for COVID-19 and help them self-isolate to prevent further spread. All COVID-19 events in the workplace to include "Suspected Cases", "Confirmed Cases" or "Close Contact Cases" shall be investigated. Contact Tracing includes:
- Gather a list of all the people who came into close contact with the infected individual
- Communicate with that list of contacts to warn them they were potentially exposed
- Provide self-isolation information or testing services
- Monitor the symptoms of each person in that list of contacts until their test results are returned or they pass the 14-day incubation period.

Confirmed or Suspected Cases from Outside the Company

Confirmed or suspected cases may not always come from employees – it could be other personnel employed by customers, visitors, suppliers or contractors. Once the company is notified of a confirmed or suspected exposure, the following protocol should be enacted:

- Provide timely information to employees on latest developments.

- Reassure employees and other relevant persons who may have had contact or exposure of the measures being taken to ensure their safety in the workplace.

- Monitor and provide assistance to persons who are either confirmed or suspected to have been infected with an infectious disease; and

- Coordinate with supplier or contractor to manage their own employees, if applicable.

Suspected Cases Within the Company

If the company is made aware that someone at the workplace is a suspect case, immediately identify and notify all personnel and others who may have come into close physical contact with the suspect case recently.

Request the affected employees to:
- Monitor their health, including doing temperature checks at least twice daily.

- Adopt good personal hygiene; and

- See a doctor immediately if they are unwell and inform their supervisors or the HR department immediately.

- If the employee is sick, they should stay at home on sick leave even if they feel that their symptoms are mild. The quarantine is for **14 days** or until a valid test has verified their condition and approved a return to work.

- When updated of the outcome of the tests for the suspect case, the employer should also notify other employees of the outcome.

Confirmed Cases Within the Company

If an employee in the workplace is a confirmed case, the company shall immediately identify and notify all personnel and others who may have come into close physical contact with the with the confirmed case. The company will assess who among such persons should be placed on quarantine. For employees who are not placed under quarantine, the company will reinforce the measures outlined below:
- Monitor their health, including doing temperature checks at least twice daily.

- Adopt good personal hygiene; and

- See a doctor immediately if they are unwell and inform their supervisors or the HR department immediately.

- Upon being notified of the confirmed case, employers should also adopt the following precautionary measures:

- Immediately vacate and cordon-off the immediate section of the workplace premises where the confirmed case worked. There is no need to vacate the building or the whole floor if there had been no sustained and close contact with the confirmed case; and

- Carry out a thorough cleaning and disinfecting of that section of the workplace premises.

- Some employees may not be able to remain physically at their workplaces if they have been asked to vacate their workstations or are pending company assessment. If it is not feasible for such employees to work from home, the company will assess their status and determine the proper action.

Note: *No matter what the situation, the company shall regularly keep in touch with an employee who is a suspect or confirmed case or was placed on quarantine. If the employee has used up his or her medical benefits provided for under the employment contract and/or collective agreement, the company will consider, on a case by case basis, providing additional medical coverage and helping the employee over the period of possible financial hardship.*

Contact with Employees

Human Resources will serve as the primary point of contact for employees who experience flu symptoms, and/or who have family members with the flu. In coordination with HR, managers will serve as focal points for their departments, while designated employees within departments will contact other employees to determine their health status and ability to remain at work. Their findings will be reported to both their managers and HR management. Employees who cannot reach HR employees or other members of their team are advised to call the company's emergency phone number to relay relevant information.

Assistance

In the event of a COVID-19 incident in the workplace contact us for assistance.