COVID-19 Preparedness and Response Plan

Introduction: Coronavirus Disease 2019 (COVID-19) is a respiratory disease caused by the SARS-CoV-2 virus. COVID-19 can cause illness ranging from mild to severe and, in some cases, can be fatal. Symptoms typically include fever, cough, and shortness of breath. A full list of symptoms commonly experienced by individuals with COVID-19 is included below. Other people, referred to as asymptomatic cases, have experienced no symptoms at all. According to the CDC, symptoms of COVID-19 may appear in as few as two days or as many as fourteen days after exposure.

COVID-19 is suspected to spread person-to-person (exposure to respiratory droplets from someone who is infected). It may be possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes, but this is not thought to be the main way the virus spreads.

To reduce the impact of COVID-19 outbreak conditions on businesses, workers, customers, and the public, the following COVID-19 Preparedness and Response Plan has been created, implemented, and enforced at Besser Company facilities.

All Besser Company employees who are reporting to work in order to conduct the Company’s critical infrastructure functions or its minimum basic operations must abide by the following guidelines at all times.

Proper educational flyers will be made available for employees regarding proper precautions to take to minimize COVID-19 risks and general COVID-19 information.

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PREPARING THE WORKPLACE AND MINIMIZING THE RISK

Per OSHA’s Risk Exposure Determination, Besser Company employees fall under the “Lower Risk” category:

- Jobs that do not require contact with people known or suspected of being infected with coronavirus.
- No frequent close contact (within 6ft) with the general public
- Minimal contact with co-workers

Accordingly, Besser Company has implemented the following pandemic guidelines in order to proactively maximize employee health and safety:

SOCIAL DISTANCING:

- Practicing social distancing by putting at least six (6) feet of distance between employees and others whenever possible, including during breaks and when reporting to or leaving the workplace.
  - When taking a break, employees are encouraged to wipe down all surfaces on which they plan to place any food before they begin their lunch.
  - When clocking in and out, employees should use only their department workstations and maintain at least six (6) feet of distance between themselves.
- Implementation of staggered work shifts.
• Utilizing remote work to the highest extent possible. Employees who have the capability to work from home are encouraged to do so.
• Restricting the number of workers onsite to no more than is strictly necessary to perform the Company’s basic operations.
• Limiting staff meetings and outside visitors to essential meetings/visits only. All others should be made via phone, video conferencing, or other appropriate means.
  o See Visitor Security Policy
• Office employees are to limit visitation to other departments and receive approval from their supervisor to visit other areas of the facility.
  o Supervisors are to implement ways to minimize the circulation of hard copy documents during this time.
  o Office employees are to maintain their own daily log that identifies any unusual interactions with other employees that have taken place within the 6-foot social distancing requirement for more than 15 minutes.
• Employees are to use the same bathroom during the workday, closest to their department/work area.
• Employees are to utilize only their department’s clocking in/out workstation.
• All employees should continue to use their standard Personal Protection Equipment (PPE), if any, that they would ordinarily use for other job tasks.
• Cloth masks have been provided to all on-site employees and field staff along with instruction on proper use.
  o Any employee that has difficulty maintaining 6 feet of distance between other employees must wear a mask.
  o Employees must wear a face covering when in shared areas, including in-person meetings, restrooms, and hallways.

HYGIENE:
• The Company has communicated with employees with on-site posters and other frequent communication regarding personal hygiene expectations for those on-site.
• When in the workplace, employees are to:
  o Clean hands often by washing with soap and water for at least 20 seconds; if soap and water are not readily available, use 60% alcohol-based sanitizer, which has been placed throughout the Company’s facilities for employees’ convenience.
  o Avoid touching eyes, nose, and mouth with unwashed or un-sanitized hands.
  o Cover coughs and sneezes with a tissue or use the inside of the elbow. Throw used tissues in the trash and immediately wash hands or use hand sanitizer.
  o Avoid shaking hands with anyone.
  o Avoid using another employee’s personal phone, desk, office, or other work tools and/or equipment, whenever possible.
  o Alert their supervisor or an HR representative immediately if they are or begin to feel sick.
• Posters displayed on site include handwashing signs in restrooms.
• Trash bins, hand sanitizer, and tissue are available to employees and visitors allowed on site.

CLEANING/DISINFECTING:
• The Company has implemented measures to clean and disinfect frequently touched surfaces at least daily.
  o Disinfecting sprays and wipes have been made available at all locations for employee use.
  o Extra staff onsite each day to sanitize frequently used areas and surfaces.
• The Company is maintaining regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.
• Consistent deep cleaning and disinfecting processes has been secured for all Besser facilities.
• Employees have access to disinfecting/cleaning wipes and are encouraged to wipe down their work areas at the end of each day.
• REFERENCE FOR DISINFECTING: Diluted household bleach solutions, alcohol solutions with at least 70% alcohol, and most common EPA-registered household disinfectants should be effective.
  o Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser.

TRAVEL:
• All non-essential business travel has been discontinued until further notice.
• Any employees who travel, internationally or domestically, may be placed on quarantine from work for two weeks upon their return. In making this determination, the Company will:
  o Regularly check CDC travel warning levels at: www.cdc.gov/coronavirus/2019-ncov/travelers.

MANAGEMENT OF SICK/SYMPTOMATIC EMPLOYEES

The Company will ensure all proper precautions are made for employees exhibiting any COVID-19-related symptoms in order to prevent the potential for further spreading of illness:

• Prior to entering our Michigan facilities, employees are required to complete a COVID-19 EMPLOYEE SYMPTOM SCREENING, including a temperature check. The Company will maintain a record of all daily employee screenings; however, all such records will be held strictly confidential and disclosed only to the extent required or allowed by law.
  o See below example
• Anyone experiencing one or more principal COVID-19 symptoms (e.g. fever, sore throat, a new uncontrolled cough that causes difficulty breathing, diarrhea, vomiting, abdominal pain, new onset of a severe headache, and new loss of taste or smell) are not to come to work.
• Employees experiencing any of the foregoing symptoms must contact their supervisor or Human Resources representative immediately to discuss time-off options.
• If employees have had close contact exposure (within 6 feet distance for at least 15 minutes) in the last fourteen (14) days with someone diagnosed with COVID-19 or displaying one or more of the principal COVID-19 symptoms, they must stay home.
• Employees must self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure during those 14 days.
• If a supervisor or manager directs an employee to leave work for any reason, the employee must promptly comply. Failure to do so could result in disciplinary action, up to and including termination of employment.
• All available leave programs will be communicated and made available to employees for easy reference.

COVID-19 EMPLOYEE SYMPTOM SCREENING EXAMPLE:

All employees and visitors entering the building must complete following form. In compliance with privacy laws, the information provided on this form will only be shared with authorized personnel who are responsible for, and make decisions regarding, the operation of the plant/office that you work at or are visiting.

NAME: _________________________________ DATE: ________________

COVID SYMPTOMS

YES NO

☐ ☐ Are you currently displaying any ONE of the following principal COVID-19 symptoms, not explained by a known medical or physical condition: a fever, an uncontrolled cough, or shortness of breath? (For reference, a fever would be a temperature reading of 100.4 °F or higher.)
Are you displaying at least **TWO** of the following symptoms, not explained by a known medical or physical condition: loss of taste or smell, muscle aches, sore throat, severe headache, diarrhea, vomiting, abdominal pain?

**EMPLOYEES MUST SELF-SCREEN THEIR OWN TEMPERATURES BEFORE REPORTING TO WORK EACH DAY. TOUCHLESS THERMOMETERS WILL BE MADE AVAILABLE AT FACILITY ENTRANCES FOR THOSE WHO DO NOT HAVE ACCESS TO A PERSONAL THERMOMETER. TEMPERATURE RECORDED: ________________________________**

If you marked “yes” to the above, you may report back to work after ten (10) days have passed since your symptoms first appeared, 24 hours without a fever, and overall improvement of any symptoms.

**COVID EXPOSURE**

**YES** ☐ **NO** ☐

To your knowledge, have you been in close contact (within 6 feet distance for at least 15 minutes) with someone diagnosed with COVID-19 or displaying any principal COVID-19 symptoms? If yes, you must stay home for fourteen (14) days.

☐ ☐ Is anyone in your immediate household currently being tested for COVID-19 due to confirmed exposure or because they are symptomatic? If yes, you must stay home until the results come back. If the results are negative, you may return to work immediately. If the results are positive, you will require further quarantine (contact HR for details).

If you marked “yes” to any of the above questions, contact HR immediately for direction.

I acknowledge that I have read and understand the items covered in this form and hereby affirm that my responses are true and accurate. Failure to complete this form will be considered insubordination.

_________________________________________

Employee Signature

While on-site you must maintain and follow steps to protect yourself and others. These include:

- Wearing a face covering for any continuous time working within a six-foot distance of others, during any in-person meetings, and when walking through the building and hallway areas.
- Cleaning hands often by washing with soap & water for 20 seconds OR by using 60% alcohol-based sanitizer;
- Putting at least 6 feet of distance between yourself and other people;
- Avoiding touching your eyes, nose, and mouth with unwashed hands;
- Covering your coughs and sneezes with the inside of your elbow; and
- Clean and disinfect frequently touched surfaces at least daily.

**ALL MICHIGAN EMPLOYEES ARE REQUIRED TO COMPLETE THIS PROCESS BEFORE PHYSICALLY REPORTING TO WORK EACH DAY.**

**ACTION PLAN FOR COVID-19 POSITIVE EMPLOYEE**

The following protocol will occur at the Company’s facilities should an employee confirm with Besser management that they have been tested positive for COVID-19 (“Employee+”).

- **EMPLOYEE+ confidentiality must be maintained at all times.**
• HR will contact the local health department (and/or any other agency required per state regulations) immediately upon becoming aware.

• Besser will identify all areas/departments/employees that have come into close contact with EMPLOYEE+ over a 14-day look-back period (within six feet proximity for 15 minutes or longer).

• Within 24 hours, all those in identified will be notified in writing that they were potentially exposed and sent home for 14 days to quarantine and instructed to:
  o Self-monitor for symptoms; check temperature twice a day; watch for primary COVID-19 symptoms; avoid contact with people at higher risk for severe illness (unless they live in the same household and had the same exposure); and follow all other appropriate CDC guidance.
  o If, after 14 days, those employees have no respiratory issues, fever, or other symptoms related to COVID-19, employee may return to work as normal.
  o An employee may also receive a test to confirm a COVID negative result for a quicker return.

• Entire department (and potentially entire facility) will be closed off immediately. Windows and doors must be opened to increase air circulation when possible.
  o Each manufacturing facility has their own respective action plan for safely and efficiently closing down operations.

• A cleaning service will be utilized to clean and disinfect all areas, focusing especially on frequently touched surfaces. Surfaces will be cleaned (removing all dirt or dust) using detergent or soap and water prior to disinfection. (Note: “cleaning” will remove some germs, but “disinfection” is also necessary.)

• Per CDC guidelines, departments and work areas may be opened for use after proper cleaning and disinfecting is complete.

• EMPLOYEE+ may return to work only after they are no longer infectious according to the latest guidelines determined by the CDC.

Besser management has adopted the above protocols for the safety and health of our employees, customers, vendors, and community members. Any changes to this COVID-19 Preparedness and Response Plan will be communicated to all employees. This Plan is to be made available for employees, customers, and the general public.

Employees who wish to file a complaint regarding any working conditions related to COVID-19 Health and Safety are to contact MIOSHA via the “ASK MIOSHA” link on their website or call 800.866.4674.


RELATED POLICIES AND FORMS:
• Telework Policy
• Visitor Security Policy
• Families First Act Forms (Sick Leave and FMLA Options)
• PTO Policy
• Covid-19 Employee Screening Process and Form