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 have been 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.
- Employees who can feasibly complete their work activities remotely are prohibited from performing in-person work. *(See Telework Policy for details.)*
- Limiting staff meetings and outside visitors to essential meetings/visits only. All others should be made via phone, video conferencing, or other appropriate means.
  - See Telework Policy
- Office employees are to limit visitation to other departments.
  - Supervisors are to implement ways to minimize the circulation of hard copy documents during this time.
- 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 face coverings have been provided to employees at no cost with instruction on proper use.
  - Any employee that has difficulty maintaining 6 feet of distance between other employees must wear a mask.
  - 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:
  - 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.
  - Avoid touching eyes, nose, and mouth with unwashed or un-sanitized hands.
  - 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.
  - Avoid shaking hands with anyone.
  - Avoid using another employee’s personal phone, desk, office, or other work tools and/or equipment, whenever possible.
  - 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.
  - Disinfecting sprays and wipes have been made available at all locations for employee use.
  - 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 asked to wipe down their work areas at the end of each day.
TRAVEL:

- All non-essential business travel has been discontinued until further notice.
  - Essential travel includes efforts to support the ongoing needs of our customers within the critical infrastructure industry.
  - Non-essential travel would include travel that can be easily postponed, canceled, or handled remotely.
- Any essential travel must be discussed with and approved by your supervisor.
- Any essential travel must be discussed with and approved by the customer prior to arrival.
  - The customer must be able to provide employee/supervisor with their COVID precautions and protocol prior to visit.
- Any employee who feels uncomfortable conducting essential travel must discuss their concerns with their supervisor to develop a plan to accommodate their concerns, while also ensuring our obligation as an essential business continues.
- Any employee who travels, internationally or domestically, may be placed on quarantine from work for 14 days upon their return. In making this determination, the Company will check local travel requirements for each scheduled visit.
- Any employee who travels for essential business must follow all CDC guidelines, including face coverings, social distancing, hand washing, and disinfecting.

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. Records will be maintained for a period of one year.
  - See below example
- Besser facilities outside of Michigan must still follow all screening procedures, although no electronic or paper documentation is required.
- Anyone experiencing one or more principal COVID-19 symptoms (e.g. fever, uncontrolled cough, or shortness of breath) or two or more secondary symptoms that are not explained by a known medical condition (e.g. loss of taste or smell, muscle aches, sore throat, severe headache, diarrhea, vomiting, abdominal pain) are not to come to work.
  - They will be allowed to return to work until 10 days have passed since the onset of symptoms and they have been fever-free for 24 hours.
- 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 an accumulative 15 minutes within a 24-hour period – two days before illness onset or two days prior to when testing occurred) 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 for 14 days from the date of exposure.
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.

Supervisors are prohibited from discharging, disciplining, or retaliating against employees who stay home for reasons of quarantine detailed above.

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**

☐ ☐ 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**

☐ ☐ To your knowledge, have you been in close contact (within 6 feet distance for an accumulative 15 minutes within a 24-hour period - two days before illness onset or two days prior to testing occurred) with someone diagnosed with COVID-19 or displaying any principal COVID-19 symptoms? If yes, you must stay home for fourteen (14) days from date of exposure/

☐ ☐ 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.
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.
- HR will work with the EMPLOYEE+ supervisor to identify all areas/departments/employees that have come into close contact (within 6 feet distance for an accumulative 15 minutes within a 24-hour period) with EMPLOYEE+ two days before illness onset or two days prior to when testing occurred.
- Within 24 hours, all those in identified will be notified by HR either verbally or in writing (whichever is quicker, but a record must be made) that they were potentially exposed and sent home for 14 days to quarantine and instructed to:
  - 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.
  - An employee may return to work after 14 days if they remain asymptomatic.
- All appropriate departments will be closed off immediately. Windows and doors must be opened to increase air circulation when possible.
- A service will be utilized to properly clean and disinfect entire department and shared spaces (or facility).
- Per CDC guidelines, departments and work areas may be opened for use immediately 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 and (if applicable) the individual is released from any quarantine or isolation order by their local health department.

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 company-wide and on the Besser website. 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

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