

COVID-19 Exposure Prevention, Preparedness, and Response

The Company takes the health and safety of our employees very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, the Company must remain vigilant in mitigating the outbreak. The Company is a proud part of the construction industry, which many have deemed “essential” during this Declared National Emergency. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented, to the extent feasible and appropriate, throughout the Company and at all of our jobsites. The Company has also identified a team of employees to monitor the related guidance that U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) continue to make available.

This Plan is based on information available from the CDC and OSHA at the time of its development and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The Company may also amend this Plan based on operational needs.

I. Responsibilities of Managers and Supervisors

The Safety Team will assume duties as the administrator for this program. This position carries the responsibility of ensuring this program is adhered to and that proper inspection, maintenance, reporting, and safety procedures are executed. The Safety Team members are as follows: Morgen Cost, Trevor Cost, Dave Meyer, Nicole Hennen.

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

II. Responsibilities of Employees

The Company is asking every one of our employees to help with our prevention efforts while at work. In order to minimize the spread of COVID-19 at our jobsites, everyone must play their part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our jobsites. All employees must follow these. In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific question about this Plan or COVID-19, please ask your manager or supervisor. If they cannot answer the question, please contact The Safety Team.

OSHA and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19,

which include the following:

- Coughing;
- Fever;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, **DO NOT GO TO WORK** and call your supervisor and healthcare provider right away. Employees shall be taking temperatures and reporting results to their supervisor prior to arriving at work. Notify your direct supervisor and leave work immediately if you develop these symptoms while at the workplace. Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.

III. Job Site Protective Measures

The Company has instituted the following protective measures at all jobsites.

A. General Safety Policies and Rules

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.
- Safety meetings will be by telephone, if possible. If safety meetings are conducted in-person, attendance will be collected verbally, and the foreman/superintendent will sign-in each attendee. Attendance will not be tracked through passed-around sign-in sheets or mobile devices. During any in-person safety meetings, avoid gathering in groups of more than 10 people and participants must remain at least six (6) feet apart. All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone
- Employees must avoid physical contact with others and shall direct others (co-workers/contractors/visitors) to increase personal space to at least six (6) feet, where possible. Where work trailers are used, only necessary employees should enter the trailers and all employees should maintain social distancing while inside the trailers.
- Elevators and hoists should be limited to no more than 3 people if Social

Distancing cannot be maintained with more people.

- Employees will be encouraged to take breaks/lunches by oneself and eliminate sharing of food or beverage, if practicable, to reduce the size of any group at any one time to less than ten (10) people. Breaks/Lunchrooms are not to be utilized for eating or congregating purposes.
- The Company understands that due to the nature of our work, access to running water for hand washing may be impracticable. In these situations, the Company will provide, if available, alcohol-based hand sanitizers and/or wipes.
- Employees are required to wear face coverings at all times unless more protective personal protective equipment is required.
- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, the Company will provide alcohol-based wipes to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- If N95 respirators become unavailable employees will be encouraged to limit use, by using engineering and work practice controls to minimize dust. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.
- Employees are encouraged to minimize time spent in the office to only what is critical. Each employee will have the ability to work remotely to complete his/her daily duties. If granted work from home privileges the employee is to abide by "Company Work from Home Policy for Covid-19".
- Employees are encouraged to minimize ridesharing. While in vehicles, employees must ensure adequate ventilation.
- If practicable, each employee should use/drive the same truck or piece of equipment every shift. Vehicles will be cleaned and disinfected regularly.
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

B. *Employee Screening*

- Employees should be taking their temperature prior to reporting to work. Any elevated temperature of 100.4 or greater is not permitted in the workplace and should be reported to their supervisor.
- The employer, if available, will conduct temperature screenings at the start, middle and end of each day.
- Supervisors should ask the following questions to all employees prior to entering the jobsite:
 - i. To the best of your knowledge, have you, or anyone in your family been in contact with a person that is in the process of being tested for COVID-19?
 - ii. Have you, or anyone in your family traveled outside of the United States within the last two weeks?
 - iii. Have you been advised to self-quarantine due to possible exposure to COVID-19?
 - iv. Are you having trouble breathing or have you had flu-like symptoms within the past 48 hours, including: fever, cough, shortness of breath, sore throat, runny/stuffy nose, body aches, chills, or fatigue?
- If an employee answers “YES” to any of these questions, that employee should be encouraged to contact their healthcare provider and must stay home until:
 - i. they are free of fever (without the use of medication) for at least 72 hours (three full days); AND
 - ii. symptoms have improved for at least 72 hours; AND at least 7 days have passed since symptoms first began.
- The employer may require a healthcare provider’s note to validate the illness or return to work of an employee with acute respiratory illness because healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely manner.

C. *Workers entering Occupied Building and Homes*

- Construction and maintenance activities within occupied homes, office buildings, and other establishments, present unique hazards with regards to COVID-19 exposures. Everyone working within such establishments should evaluate the specific hazards when determining best practices related to COVID-19. Site specific plans will be created for each job to control any exposure hazard and inform employees of potential hazards.
- During this work, employees must sanitize the work areas upon arrival,

throughout the workday, and immediately before departure. The Company will provide alcohol-based wipes or approved cleaning supplies for this purpose.

- Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum. Workers should wash or sanitize hands immediately before starting and after completing the work.

D. Job Site Visitors

- The number of visitors to the job site, including the trailer or office, will be limited to only those necessary for the work.
- All visitors will be screened in advance of arriving on the job site. If the visitor answers “yes” to any of the following questions, he/she should not be permitted to access the jobsite:
 - Have you been confirmed positive for COVID-19?
 - Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
 - Have you been in close contact with any persons who has been confirmed positive for COVID-19?
 - Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
- Site deliveries will be permitted but should be properly coordinated in line with the employer’s minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if at all possible.
- No outside vendors or visitors are permitted into the facility without prior approval by the Company president. When inside the building the door is to remain locked at all times. Employee should utilize the Ring Doorbell to tell who has arrived at the office. There will be designated bins outside the front door for package deliveries. If on a jobsite place signs and zone off.

E. Personal Protective Equipment and Work Practice Controls

- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), the Company will also provide:
 - Gloves: Gloves should be worn at all times while on-site. The type of

glove worn should be appropriate to the task. Employees shall not share gloves.

- Eye protection: Eye protection should be worn at all times while on-site.
- Institute a rigorous housekeeping program to reduce dust levels on the jobsite.

NOTE: The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Nevertheless, employees must wear N95 respirators if required by the work and if available.

- Due to the current shortage of N95 respirators, the following Work Practice Controls should be followed:
 - Keep dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.
 - Limit exposure time to the extent practicable.
 - Isolate workers in dusty operations by using a containment structure or distance to limit dust exposure to those employees who are conducting the tasks, thereby protecting nonessential workers and bystanders.

IV. Job Site Cleaning and Disinfecting

The Company has instituted regular housekeeping practices, which include cleaning and disinfecting frequently used tools and equipment, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas. Jobsite trailers and break/lunchroom areas will be cleaned at least once per day. Employees performing cleaning or group temperatures, will be issued proper personal protective equipment (“PPE”), such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC. Employee is to wash hands after removal and disposal of gloves. During this time OSHA has issued temporary enforcement to their existing standards. Please see Checklist for employer & employees responsibilities.

- Bathrooms will be cleaned frequently throughout the day.
- Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.

- Any portable jobsite toilets should be cleaned regularly by the leasing company to ensure that each portable toilet is maintained in a clean, sanitary, and serviceable condition. The Company will ensure that hand sanitizer dispensers are always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently.
- Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.
- Copiers, postage machines and other office equipment will have disinfectant stationed near the devices. These devices are to be wiped off before and after each use.
- OSHA has indicated that a reliable report that an employee has tested positive for COVID-19 does not typically require an employer to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids.² Notwithstanding this, the Company will clean those areas of the jobsite that a confirmed-positive individual may have contacted and it will do so before employees can access that work space again.
- The Company will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA-registered household disinfectant;
 - Alcohol solution with at least 60% alcohol; or
 - Diluted household bleach solutions (if appropriate for the surface).
- Avoid using pressurized air or water spray cleaning techniques that may result in generation of bio aerosols.
- The Company will maintain Safety Data Sheets of all disinfectants used on site.

[Visit \(https://www.osha.gov/SLTC/covid-19/controlprevention.html\)](https://www.osha.gov/SLTC/covid-19/controlprevention.html) for more information.

Jobsite Exposure Situations

- **Employee Exhibits COVID-19 Symptoms**

If an employee exhibits COVID-19 symptoms, the employee must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). The Company will similarly require an employee who reports to work with symptoms to return home until he or she is symptom free for 72 hours (3 full days). To the extent practical, employees may be required to obtain a doctor's note clearing them to return to work.

- **Employee Tests Positive for COVID-19**

An employee who tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and are symptom free may return to work when at least seven (7) days have passed since the date of his or her first positive test, and have not had a subsequent illness. Employees who test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;³ and (2) at least seven (7) days have passed since symptoms first appeared.

Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers. The Company may require an employee to provide documentation clearing his or her return to work.

- **Employee Has Close Contact with an Individual Who Has Tested Positive for COVID-19**

Employees who have come into close contact with an individual who has tested positive for COVID-19 (relative, co-worker or otherwise) will be directed to self-quarantine for 14 days from the last date of close contact with that individual. Close contact is defined as six (6) feet for a prolonged period of time.

If the Company learns that an employee has tested positive, the Company will conduct an investigation to determine co-workers who may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals who have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with that employee. If applicable, the Company will also notify any sub-contractors, vendors/suppliers or visitors who may have had close contact with the confirmed-positive employee. If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact and self-quarantine for 14 days from the last date of close contact with that individual.

³ Recovery is defined as: (1) resolution of fever without the use of fever-reducing medications and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

VI. OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for recordability and reportability under OSHA’s recordkeeping rule. OSHA requires construction employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that

- (1) results in a fatality, or
- (2) results in the in-patient hospitalization of one or more employee. “In-patient” hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has made a determination that COVID-19 should *not* be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an “illness.” However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 but is not a confirmed diagnosis, the recordability analysis is not necessarily triggered at that time.

If an employee has a confirmed case of COVID-19, the Company will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from an exposure outside of the work environment, it would *not* be work-related, and thus not recordable.

The Company’s assessment will consider the work environment itself, the type of work performed, the risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the Company will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident.

VII. Confidentiality/Privacy

Except for circumstances in which the Company is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others. The Company reserves the right to inform other employees that an unnamed co-worker has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health. The Company also reserves the right to inform sub-contractors, vendors/suppliers or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

VIII. General Questions

Given the fast-developing nature of the COVID-19 outbreak, the Company may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact The Safety Team. You can also access these documents in the employee portal by visiting (<https://www.thefcscore.com/fcs/login.php>).

COVID-19 Checklist for Employers and Employees

Know the Symptoms of COVID-19

- Coughing, fever, shortness of breath, and difficulty breathing.
- Early symptoms may include chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose. If you develop a fever and symptoms of respiratory illness, **DO NOT GO TO WORK** and call your supervisor and health-care provider immediately. Do the same thing if you come into close contact with someone showing these symptoms.

Employer Responsibilities

- Develop a COVID-19 Exposure Action Plan.
- Conduct safety meetings (toolbox talks) by phone if possible. If not, instruct employees to maintain 6-feet between each other. The foreman/supervisor will track attendance verbally rather than having employees sign an attendance sheet.
- Access to the job site and work trailer will be limited to only those necessary for the work.
- All visitors will be pre-screened to ensure they are not exhibiting symptoms.
- Employees, contractors, and visitors will be asked to leave the jobsite and return home if they are showing symptoms.
- Provide hand sanitizer and maintain Safety Data Sheets of all disinfectants used on site.
- Provide protective equipment (PPE) to any employees assigned cleaning/disinfecting tasks.

Employee Responsibilities

- Become familiar with the Exposure Action Plan and follow all elements of the Plan.
- Practice good hygiene: wash hands with soap and water for at least 20 seconds. If these are not available, use alcohol-based hand rub with at least 60% alcohol. Avoid touching your face, eyes, food, etc. with unwashed hands.
- Not reporting to work - if symptoms occur and let supervisor know immediately
- Wear face coverings while in the workplace or on a jobsite

Cleaning/Disinfecting Job Sites and Other Protective Measures

- Clean and disinfect frequently used tools and equipment on a regular basis. This includes other elements of the jobsite where possible. Employees should regularly do the same in their assigned work areas.
- Clean shared spaces such as trailers and break/lunchrooms at least once per day.
- Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.
- Avoid sharing tools with co-workers. If not, disinfect before and after each use.
- The employer shall implement a schedule to ensure that each portable toilet is regularly maintained in a clean, sanitary, and serviceable condition.
- Trash collected from the jobsite must be changed frequently by someone wearing gloves.

Personal Protective Equipment and Alternate Work Practice Controls

- Provide and wear the proper PPE.
- Keep the dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.