



PURPOSE

The purpose of this program is to educate our employees and provide the structure to continue operations during a pandemic.

CORONAVIRUS (COVID-19)

Coronaviruses are a large family of viruses you are likely already familiar with including the common cold and more severe diseases like Middle East Respiratory Syndrome (MERS-CoV) and Severe Acute Respiratory Syndrome (SARS-CoV).

A public health emergency was declared in the United States on January 31, 2020 which necessitated managers, safety directors, human resources managers, and those in similar roles to provide responsible work plans to support and protect their workforces. This program is to communicate specific dangers associated with COVID-19 as well as provide guidance for any future pandemic events.

Novel coronavirus is a new strain that was not previously found in humans. You will see this novel coronavirus referred to as “coronavirus disease,” SARS-CoV-2, COVID-19, and 2019-nCoV. These terms can be used interchangeably. The outbreak is impacting people around the world. Most people who become infected with coronavirus experience mild illness and recover, however it can be more severe for others.

People of all ages can be infected by coronavirus. Those with pre-existing medical conditions like asthma, diabetes, and heart disease, and older people are more susceptible to becoming severely ill with the virus which may impact their chances of making a complete recovery.

Signs of coronavirus infection include respiratory symptoms like cough and shortness of breath accompanied by a fever. In severe cases, COVID-19 can cause pneumonia, SARS, kidney failure, or death. The usual precautions apply for preventing the spread of coronavirus infection, including hand washing, covering your mouth and nose when coughing or sneezing, and avoiding close contact with people showing symptoms of respiratory illness. This document will provide more specific information and steps and resources suitable for employees from a workplace risk management perspective.

Ensure a foundation of good hygiene

No matter what is going on in the world with infectious disease or the usual flu season, it is always best practice to wash your hands frequently with soap and water. This kills viruses that may be on your hands. When soap and water are not accessible, use of a 60% (minimum) alcohol-based hand sanitizer is recommended.

Keep at least 6 feet from all individuals outside of your immediate household. Practice “social distancing” by not shaking hands, hugging, sharing food or beverages etc. Practice good social etiquette by sneezing or coughing into the bent elbow of your arm while turning away from others. Social distancing helps slow the spread of viruses by putting space between you and airborne droplets that could contain viruses. If you are coughing or sneezing into a tissue, dispose of any used tissues immediately, and then wash your hands.

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Even with proper and frequent hand washing, it is important to avoid touching your eyes, nose, and mouth. If you touch a surface containing a virus with your hands, that virus could quickly enter your body through the nose or eyes and cause illness.

Surfaces in common areas of our workplace will be cleaned more frequently. We encourage all of our employees to follow the same protocols at home by using chemical disinfectants labeled to be effective at killing CORONA VIRUSES. Look for bleach/chlorine-based disinfectants, the solvents of bleach or chlorine, 75% ethanol, peracetic acid, and chloroform. These chemicals should not be put on your skin or under your nose as they will cause harm to your skin and respiratory tract.

CONTINUITY

The purpose of this program is to provide a plan for continuity of business services and to provide guidance in regard to the Coronavirus (COVID-19) pandemic and to mitigate the risk for employees being exposed to COVID-19 while in the workplace environment. A key component of this standard is a written Emergency Workplace Sanitization Plan (EWSP) for our offices and active project sites where construction tradesmen and other construction services personnel will be stationed and interacting with client personnel. Full compliance with the standard is required effective immediately. As this is a developing situation, amendments may be necessary and issued over time.

This procedure provides general guidance on workplace sanitization in accordance with the currently understood guidelines and recommendations from the local, state, and federal authorities.

A combination of control measures will be required to achieve this objective. We will select the most effective and appropriate control technologies to ensure that the best practices as described are followed at worksites.

As new information becomes available, we strive to keep employees, subcontractors, and clients informed and up to date. The intent is that the work procedures we establish will protect not only our workers but all workers on our worksites from un-needed exposure to COVID-19.

KEY RESPONSIBILITIES

Due to the risk posed by exposure to COVID-19, it is critical that personnel involved in “essential” operations as well as working in our corporate offices or visiting our sites take specific action to ensure proper sanitization is practiced and the risk of exposure minimized.

Corporate office and individual job sites:

- We have implemented a business continuity plan to be used during “PANDEMIC” restrictions
- We have implemented a written and practiced emergency sanitization plan to reduce the transmission risk of the COVID-19 virus.
- We have regular communications to all of our employees on workplace updates and current best practices in regard to controlling the risk for exposure.
- We have implemented A daily employee exposure risk assessment relative to COVID-19
- We have included toolbox talks regarding and related to Coronavirus for all employees
- We have made an evaluation of all work sites and rated the possible exposure as either minimal, moderate, high or very high
- We have assigned responsible persons in our organization for COVID-19 awareness and training

As a subcontractor we are responsible for:

Ensuring communications throughout our organization including to our “off-site” workforce in regard to the following items.

- How the Coronavirus is spread

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- The importance of hygiene habits
- Our employees risk exposure at work
- What the company's practices are from a sanitization perspective
- What to do if symptoms develop when not at work – relative to not reporting to work and informing appropriate company personnel
- What to do if symptoms develop while at work
- Identifying what PPE is appropriate for the work conditions

Our employees are responsible for:

- Knowing the hazards and risk of Coronavirus exposure and following procedure
- Using the assigned protective equipment in an effective and safe manner
- Setting up all operations in accordance with a predetermined site-specific plan
- Following established work procedures as directed by the supervisor
- Reporting any related conditions to the supervisor
- Knowing how and when to report exposure
- Cooperating with good sanitization practices and social distancing

MASKS

We will follow the local county and state directives, but normally healthy people do not necessarily need to wear a mask in all situations and environments. It is advised that you have one with you as many businesses are requiring a mask be worn to enter. Always wear a mask if you are caring for someone that is infected, suspected of being infected, having symptoms of COVID-19 or coughing and/or sneezing. If you do wear a mask, understand its limitations, how to wear it correctly, as well as how to dispose of it properly. When masks are used or disposed of improperly, they may cause additional risks.

Communication

We will communicate with our employees and partners to share information from reputable sources and relevant company policy. We will only use information from credible sources such as coronavirus.gov, osha.gov or the state equivalent.

In pandemic situations, we will have as many of our employees as possible work remotely and encourage employees to stay home if they are sick or have any symptoms. This rule will be enforced in time of pandemic along with monitoring and testing for symptoms. In the case of COVID-19 individuals experiencing fever, cough and any difficulty breathing will not be permitted entry to the workplace. If a person is experiencing these symptoms, they should seek medical attention, and call their provider's office in advance. Depending on their location, authorities may direct them to a specific health facility based on any outbreak or response protocols.

SICK LEAVE

Sick time and leave policies will be reviewed and amended as necessary to reflect policy or laws enacted during a pandemic. Employees will be allowed time to either take care of themselves and other family members or members of the same household. Depending on the circumstances "pandemic pay" may be offered to reduce the possibility of virus transmission.

MEETINGS

Meetings will be done via Zoom, MS Teams, Skype or other meeting software that is available whenever possible. When meetings are done in person there may be a cap on the number of individuals gathered in one place as well as the space between them.

For COVID-19, the numbers are no more than 10 individuals together with at least 6 feet between them and face coverings.

TRAVEL

During a pandemic, non-essential business travel will be suspended. Employees that need to travel for essential business, we will make a specific plan for how the travel will take place and what type of quarantine,

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if any, traveling employees will need upon their completion of travel related to essential business. Any employee traveling for family emergencies or leisure, must ensure they are informed on the latest travel advisories. Several global organizations have already limited travel. As pandemic news breaks encourage employees to discuss their travel plans, purchase trip insurance, and to avoid travel if they have a fever and cough. If a person were to become sick during air travel, they should inform the crew and seek medical care upon arrival.

INFORMATION

Only use the most local and most reliable sources for information during a pandemic. We recommend first local county and city information followed by information published for our state of operation and then information from federal sources. Be wary of information that isn't coming from a credible source, especially if the information seems too good to be true.

In a pandemic such as COVID-19 information will change quickly as the pandemic progresses and our initial responses may be refined. The local county, state and CDC risk assessments at Utah.coronavirus.gov are our source for language and policy related to the COVID-19 outbreak.

MANAGING STRESS

It's normal to feel confused, lost, scared, or other emotions during an outbreak. Refer to the sites identified herein to ensure you are informed. Read information rather than watching "news casts" as this will give you more time to absorb information in a non-sensationalized way. As a company, we will share information as it relates to our business.

WORKING FROM HOME

If you find yourself working from home, do your best to maintain a healthy lifestyle by eating well, getting enough sleep, and reaching out to friends, family, and co-workers to stay social. If you have children or others in the home who are feeling stressed with the news of the day, be supportive and listen to their concerns. Share factual information and be mindful to strike a balance.

CODE OF SAFE PRACTICES

In addition to our safety program's Code of Safe Practices, we have adopted a code of practice governing workplace sanitization and practices related to reducing the spread of COVID-19. The code of practice includes measures to be used to help reduce the spread of COVID-19 and to improve sanitary conditions at our sites. These include general workplace practices along with specific site practices established via site specific protocols.

Risk Identification, Assessment and Control

The following assessment methodology will be followed to determine what, if any exposures exist for our employees and sites and to what extent each of those employees need to be protected from COVID-19. This will include an evaluation of who will have direct contact with the public, with co-workers who may be infected, and / or areas that may have been infected. This assessment will lead to the following classifications: Very high-risk exposure, high risk exposure, moderate risk exposure, and minimal risk exposure.

EXPOSURE TYPES

A key step in developing this plan is to identify the work activities that would put workers at risk of exposure per these classifications as follows:

OUR BUSINESS RISK IS CLASSIFIED AS MINIMAL OR LOW

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- Very High Risk — *not anticipated for our employees or sites*. Generally, this is considered as medical professionals who provide aerosol generating medical procedures to infected patients – usually doctors, nurses, medical laboratory technicians, etc.
- High Risk – *not anticipated for our employees or sites*. Generally, this is considered as medical or paramedical professionals such as nurses, first responders, first aid providers, etc. In regard to first aid related to COVID-19, all are encouraged to direct these individuals to go home and self-isolate upon notice.
- Moderate Risk – *may occur for our employees or sites*. Generally, this is considered as having frequent exposure to the public, publicly handled goods, and potentially contaminated surfaces. Personnel that fit this category are those that will interact with active client reception areas handling multiple people, sales and marketing personnel when touring client sites, and others that may have to actively engage on a regular basis with client personnel particularly when moving to multiple sites. The following PPE should be considered based on conditions, latex or nitrile gloves, safety glasses, and when appropriate, N-95 respirator or equivalent. Consultation with the client site safety director in regard to site requirements and coordination with third party safety auditor for an evaluation of conditions to ensure an appropriate level of PPE is being employed.
- **Minimal Risk – *most applicable to our employees and sites*. Generally, this is considered as having limited exposure to the public, publicly handled goods, and potentially contaminated surfaces as part of someone’s routine job duties. In another way, this is all employees and subcontractors that are not otherwise classified as per the above.**

PPE

PPE for these employees should follow that which has historically been employed for their work unless specified otherwise by site conditions or after consultation with our site managers and/or third-party safety auditor.

In regard to the use of respirators, please refer to company policies for the use of respirator devices. In addition, please refer to the current publications of the US Department of Labor regarding any temporary conditions that may be established around the use of face pieces and respirators.

CONDITIONS FOR ENTRY

We have provided a checklist that should be completed by all parties entering our workplace and job sites on a daily basis. If people are not compliant; they will be turned away from the site. The checklist at the end of this document labeled COVID-19 Pre-Screen Questionnaire.

A Passive Screening Poster will also be at the location of the project site, sign-in book, or entry doors. Stay up to date with the current best practices published by the local, state, and federal government.

Currently, these practices include the following:

- Wash and sanitize your hands frequently
- Don’t shake hands
- Use social distancing of at least six feet
- If you must sneeze or cough, use your elbow or tissue.
- Stay home if you are sick
- Minimize face to face meeting and use technology when possible such as Zoom, Skype, MS Teams, etc.

HAND WASHING

Due to limitations on the amount of hand sanitizer that may be available, be sure to identify hand washing locations within existing sites. If access is distant or not yet set up, consider portable hand washing stations to enable adequate hand washing facilities for the project site and staff size.

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SURFACES - SANITIZATION

We have engaged cleaning staff and/or site laborer staff to wipe down all direct contact surfaces with disinfectants approved for elimination of the virus causing the pandemic these disinfectants will be used (including but not limited to) the following areas:

- Door handles and pushes
- Light switches
- Furniture
- Horizontal surfaces
- Chairs and arm rests
- Appliances
- Trash can lids

ADMINISTRATIVE CONTROLS

We will follow these safe work practices:

- Exposure control plans and the site risk assessment/work plan will be established prior to the start of daily work.
- Exposure control plans and the site risk assessment/work plan will be established prior to the start of each new project
- Establish procedures for housekeeping, restricting work areas, personal hygiene, worker training, and supervision.
- As part of project planning, assess if there are any exposures that will need to be treated as above low risk.
- Warning signs will be posted to alert workers to the COVID-19 issue and related site restrictions.
- Workers will comply with the daily COVID-19 checklist established at the site. This will include any site-specific procedures such as access points, testing, etc.
- Develop a Site-Specific Control Plan to cover project-specific issues (e.g., scope of work, project location and site-specific hazards) and to be kept available at the worksite.

PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION

When respiratory protection is required, each employee's company will provide the appropriate respirator in compliance with OSHA's Respiratory Protection standard (29 CFR 1910.134).

Respiratory Protection is required:

- Where specified in Table 1 of the standard
- For tasks not listed in Table 1, or where it is not feasible to implement engineering or work practices during periods where controls are being installed, maintenance and repair tasks are being performed, and the level of exposure could exceed the PEL
- All workers who wear respirators will do so in adherence with our company's respirator program.
- Respirators must be selected based upon measured exposure levels and the assigned protection factor of respirators.
- Only NIOSH approved respirators will be used.
- Workers who wear respirators will be clean-shaven. Filtering face piece respirators give little or no protection to workers with beards, and even a minor growth of stubble can severely reduce the effectiveness of respiratory protection.
- All workers who wear respirators will be fit-tested.
- Workers will be properly trained in the use of respirators; supervision, inspection, and maintenance will be followed.

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PROTECTIVE CLOTHING

Each employee's company will provide workers in a risk exposure above low risk with protective equipment suitable for the exposure and commensurate with their operating company guidelines but no less than what is prescribed herein.

HOUSEKEEPING

Dry sweeping or dry brushing will not be permitted. Wet sweeping or use of a HEPA-filtered vacuum is required unless not feasible. Compressed air is not permitted unless the dust generated is captured by local exhaust ventilation.

GENERAL

Also, refer to COVID-19 Prevention for Construction Services attachment

MEDICAL SURVEILLANCE

Employees that use a respirator for 30 days or more per year will undergo medical surveillance at no cost. Medical examinations and procedures will be performed by a physician or licensed health care provider (PLHCP). Medical surveillance will include:

- Initial exam within 30 days after initial assignment
- Periodic exams every 3 years or more if recommended

Each trade subcontractor will provide the following information:

- Description of employees former, current, and anticipated duties with respect to exposure
- Description of former, current, and anticipated exposure level
- Description of PPE used and when and for how long the employee has used or will use the PPE
- Previous employment related medical exams

The PLHCP will provide the employee and subcontractor company with results of the medical exam within 30 days.

DOCUMENTATION

Records must be kept of the following:

- Worker education and training sessions
- Respirator fit-testing
- Equipment maintenance and repair
- Worksite inspections
- Air monitoring data
- Objective data used for exposure assessment
- Medical surveillance

EDUCATION AND TRAINING

We will address each viral pandemic threat in our Hazard Communication Program.

COVID-19

A worker who may be exposed to COVID-19 is to be informed of the potential health conditions associated with it, the current best practices surrounding prevention of its spread, and what action to take if exposed

EXPOSURE

Bearing in mind that the company goals are to keep running to provide services that are essential to the health and safety of the community and actively working to ensure that, we trust that these protocols will enable such projects to move forward safely. In the event that one of the following occurs:

- Local county health department makes an advisory specific to our operations
- Confirmed positive test of worker or building occupant

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- Government intervention or emergency declaration whereby actively continuing would constitute a violation of local, state or federal law
- Building owner or client discretion or directive

We will re-evaluate and decide to limit or temporarily halt business operations and/or construction projects and/or installation projects and/or service projects at sites and/or our offices.

The listing of actions below are considered minimum at this time.

Employees must:

- Clean their hands often with an alcohol-based hand sanitizer that contains at least 60-95% alcohol.
- Wash with soap and water for at least 20 seconds if hands are visibly dirty.
- Not share tools that haven't been sanitized.
- Not to gather in lunch areas – maintain social distancing.
- Not to share personal protection equipment.
- Not use common appliances without proper sanitization by users.
- Utilize disposable gloves where appropriate.
- Sanitize reusable personal protective equipment per manufacturer's recommendation prior to each use.
- Utilize disposable hand towels and no-touch trash receptacles.
- Avoid cleaning techniques, such as using pressurized air or water sprays, that may result in the generation of aerosolized mist.

Management must:

- Direct employees to clean their hands often.
- Provide soap and water and/or alcohol-based hand rubs on the job site.
- Ensure that adequate supplies are maintained.
- Place hand washing stations in multiple locations to encourage hand hygiene.
- Disinfect reusable supplies and equipment.
- Designate specific areas and protocols for trash removal. Workers responsible for trash removal should be wearing personal protective equipment and wash hands for at least 20 seconds with soap and warm water.
- Ensure routine cleaning of the work environment (doorknobs, keyboards, counters, and other surfaces) is being conducted.
- Provide individual water bottles for employees or require employees to bring their own.
- Direct employees to use best practices in regard to segregating work clothing and work clothing cleaning.
- Not authorize multiple trades to work in the same area at the same time if possible.
- Ensure added sanitation and disinfection of toilet and restroom facilities.
- Ensure employees are not coming to work sick. If an employee presents any symptom of illness consistent with COVID-19, that employee should not be permitted to work. Employees who appear to have fever or acute respiratory illness symptoms (cough, shortness of breath) on arrival or during the workday, that employee should be immediately sent home.