

**USUI INTERNATIONAL CORPORATION**

**COVID-19 Preparedness and Response Plan**

*Revised August 5, 2020  
Developed April 20, 2020*

**INTRODUCTION**

Usui International Corporation (hereinafter “Company”) takes the health and safety of our workers 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 COVID-19’s impact. In order to promote safety and maintain operations, we have developed this COVID-19 Preparedness and Response Plan (“Plan”) to be implemented effective as of May 1, 2020 throughout the Company, which includes its facilities in Ohio and Virginia, and its office in Michigan.

This Plan is based, at the time of its development, on information available from the U.S. Department of Health and Human Services’ Centers for Disease Control and Prevention (“CDC”), the U.S. Department of Labor’s Occupational Safety and Health Administration (“OSHA”), and state issued orders from Ohio, Virginia, and Michigan.

This Plan 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.

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## **RESPONSIBILITIES OF MANAGERS AND SUPERVISORS**

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must follow this Plan at all times at work. Managers and supervisors must require this same behavior from all employees.

## **RESPONSIBILITIES OF EMPLOYEES**

In our efforts to protect the health and safety of our employees, the Company is asking every one of our employees to play his or her part. As set forth in this Plan, the Company has instituted various practices, which all employees must follow at work. If employees have specific questions about this Plan or COVID-19, such employees should ask the Company's workplace coordinator responsible for COVID-19 issues or their manager or supervisor.

## **BASIC INFECTION PREVENTION MEASURES**

The Company has implemented the following basic infection prevention measures. These measures are issued to all employees.

All managers, supervisors, and employees of the Company (collectively, "workers") must as necessary during work:

- Frequently and thoroughly wash their hands with soap and water for at least 20 seconds.
  - Use an alcohol-based hand rub with at least 60% alcohol if soap and running water are not immediately available.
- Avoid touching their eyes, noses, or mouths with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering coughs and sneezes, with an elbow or arm.
- Stay home if they are sick.
- Refrain from using other workers' phones, desks, offices, or other work tools, or common areas and equipment, when possible.
- Wearing face coverings in the workplace as required by a federal, state, or local government order.
- Adhere to recommended social distancing practices which include but not limited to:
  - Remaining at least six feet from people during work to the extent feasible under the circumstances.
  - Wearing cloth masks and practice appropriate social distancing where other social distancing practices are difficult to follow, and especially in areas of significant community-based transmission.

The Company to date does the following:

- Provide workers, customers, and worksite visitors with a place to wash their hands.
  - Provide them an alcohol-based hand rub with at least 60% alcohol if soap and running water are not immediately available.

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- If possible for certain segments of the workforce establish policies and practices to promote remote work to the fullest extent possible, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts) to increase the physical distance among workers and between workers and others in accordance with state authorities' mandatory social distancing measures.
- Restrict the number of workers present on the premises to those who are necessary to perform the Company's critical infrastructure functions.
- Maintain distances of six feet among one another between workers, customers, and worksite visitors to the maximum extent possible.
- Evaluate administrative or other engineering controls to maintain distances between work stations of at least 6 feet to the maximum extent possible.
- Modify the layout of lobbies, break rooms, lunch rooms, and other common areas to reduce the number of tables, chairs, and other furniture to maintain proper social distancing practices.
- Enhance regular housekeeping practices, including increasing the frequency and thoroughness of routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment, and use U.S. Environmental Protection Agency ("EPA") approved disinfectants with claims against emerging viral pathogens and follow the manufacturer's instructions for use of all cleaning and disinfection products (e.g., concentration, application method and contact time, and Personal Protective Equipment ("PPE")).

### **POLICIES AND PROCEDURES FOR PROMPT IDENTIFICATION AND ISOLATION OF SICK PEOPLE**

Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers, customers, visitors, and others at a worksite.

The Company has implemented the following policies and procedures for prompt identification and isolation of sick people:

- Workers must self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure. The Company has provided information to workers about the signs and symptoms of COVID-19, including fever, atypical cough, atypical shortness of breath, or fatigue, to assist them in self-monitoring. Where required by state government order the Company also recommends employees self-take their temperature before reporting to work.
- Workers reporting or exhibiting signs and symptoms of COVID-19 or suspecting exposure to COVID-19 are prohibited from entering any Company premise or client-worksite.
- Workers testing positive for COVID-19 or demonstrating principal symptoms of COVID-19, such as fever, atypical cough, atypical shortness of breath, or fatigue must not report for work.
  - Such workers must notify their manager or supervisor immediately.
  - Such workers may only come into work as provided for under then current CDC Guidance, currently consisting of all of the following: ten (10) days have passed since the start of symptoms; and the worker has been free of fever for 24 hours

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without the use of fever-reducing medications; and, other symptoms have improved.

- Workers who test positive for COVID-19 but never develop COVID-19 symptoms may return to work consistent with CDC Guidance, which currently provides for ten (10) days after the date of their first positive COVID-19 test.
- Workers must not come into work if they have had close contact with an individual who tests positive for COVID-19 or with an individual who displays one or more of the principal symptoms of COVID-19 (fever, atypical cough, atypical shortness of breath, or fatigue).
  - Instead, such workers must notify their manager or supervisor right away.
  - Such workers may come into work, consistent with CDC Guidance which currently provides, only after either 14 days have passed since the last close contact with the sick or symptomatic individual, or the symptomatic individual receives a negative COVID-19 test.
- The Company has designated and trained certain workers as point persons for how to immediately isolate a person who shows symptoms of COVID-19 at work.
  - In such a case, while maintaining proper social distancing, the point person will take the potentially infectious person to a location away from workers, customers, and other visitors.
  - Evaluate and identify a designated area(s) with closable doors may serve as isolation rooms until a potentially sick person can be removed from the worksite and sent home.
- The Company takes steps to limit spread of the respiratory secretions of a person who may have COVID-19, including providing a face mask, if feasible and available, and asking the person to wear it, as required under applicable state government orders.
- If a worker is confirmed to have COVID-19, the Company must inform fellow workers of their possible exposure to COVID-19 in the workplace recognizing that such disclosure is necessary to avoid a direct threat of health to others in the workforce and not a violation of the requirement of the Americans with Disabilities Act.
- The Company will also notify the local health department of the confirmed COVID-19 as required by any state government or local order.
- The Company will instruct fellow workers about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure.
- If a sick worker is suspected or confirmed to have COVID-19, the Company will follow the CDC cleaning and disinfection recommendations.

## WORKPLACE FLEXIBILITIES AND PROTECTIONS

The Company has implemented the following workplace flexibilities:

- The Company will treat a worker who is absent from work because that worker is at particular risk of infecting others with COVID-19 pursuant to the Company's leave policies.
- *The Company will not discharge, discipline, or otherwise retaliate against a worker for staying home when that worker is at particular risk of infecting others with COVID-19.*
  - Workers who are allowed to return to work but decline to do so may face discipline or discharge.

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- Workers who return to work, if they test positive for COVID-19 or who display one or more of the principal symptoms of COVID-19, before the applicable isolation period is completed may be discharged or disciplined because such behavior places other workers and their families at *an increased risk* of contracting COVID-19.
- Although the Company may not require a healthcare provider's note for workers who are sick with COVID-19 to validate their illness or to return to work, the Company expects workers to utilize good-faith and honorable conduct when making decisions regarding COVID-19 related sick leave and returning to work.
- In the event leave is related to the care of a family member who is sick with COVID-19 while the worker is not, the Company will try, to the extent possible, to utilize the worker in a remote working capacity in order to reduce the leave necessary for the worker to expend. However, there are circumstances and worker-titles that do not support remote working and cannot possibly be accommodated.

The Company is first and foremost concerned about the health and safety of its workers. The Company has developed policies and procedures to protect its workers and their families. Thus, the Company has implemented the following workplace protections:

- The Company will communicate with any businesses that provide the Company with contract or temporary workers about the importance of sick workers staying home and encourage the businesses to develop non-punitive leave policies.
- The Company's policies and procedures pertaining to COVID-19 are contained in this guide. Such policies and procedures and other best practices will be disseminated via electronic communication, and posted at all worker entrances, exits, and common areas.
  - Posters must communicate information on COVID-19, social distancing, recommended measures at home, and how to correctly wear and dispose of disposable PPE, as applicable.
- Each of the following persons will act as workplace coordinator regarding COVID-19 policies and related issues in their respective locations and states of operation:
  - Tim Sircy, Michigan
  - Kyle Shepherd, Ohio
  - Nikki Herndon, Virginia
- Each individual identified immediately above will be responsible for the following items:
  - Information specific to the medical insurance plan offered by the Company. Workers should contact the person identified in their location with questions about medical care in the event of a COVID-19 outbreak.
  - To the extent required the workplace coordinator will be responsible for designating and training workers as point persons to help manage COVID-19 issues and their impact at the workplace.
  - Notifying local health departments of confirmed COVID-19 cases as is required by any state or local government orders.

## EXISTING OSHA STANDARDS

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While there is no specific OSHA standard covering exposure to COVID-19 itself, existing OSHA standards may apply to protecting workers from such exposure. Hence, the Company will continue to follow all existing OSHA standards.

### CONTINGENCY PLANS

The Company will follow federal and state, local, tribal, and/or territorial recommendations regarding development of contingency plans for situations that may arise as a result of outbreaks, such as:

- Increased rates of worker absenteeism.
- The need for social distancing, staggered work shifts, downsizing operations, and other exposure-reducing measures.
- Options for conducting essential operations with a reduced workforce, including cross-training workers across different jobs in order to continue operations or deliver surge services.
- Interrupted supply chains or delayed deliveries.

### LEVEL OF RISK OF OCCUPATIONAL EXPOSURE

The Company has conducted an internal evaluation of its operations and determined that the level of risk of occupational exposure to COVID-19 associated with various worksites and job tasks workers perform at those sites is at the lower (caution) risk based on an assessment of OSHA's Guidance on Preparing Workplaces for COVID-19.

The Company's risk assessment may be subject to change if its operations are in an area of ongoing community transmission, and workers in this category may have contact with the general public.

### PROTECTING WORKERS WITH JOBS AT LOWER EXPOSURE RISK (CAUTION)

The Company will implement workplace controls sufficient to protect workers with jobs at lower exposure risk (caution) as determined.

#### *Engineering Controls*

Engineering controls involve isolating workers from work-related hazards. Additional engineering controls are not recommended for workers in the lower exposure risk group. However, the Company must ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended.

#### *Administrative Controls*

Administrative controls require action by the worker or Company. Typically, administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard.

The Company will implement the following administrative controls:

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- Monitor public health communications about COVID-19 recommendations and ensure that workers have access to that information.
- Frequently check the CDC COVID-19 website: [www.cdc.gov/coronavirus/2019-ncov](http://www.cdc.gov/coronavirus/2019-ncov).
- Collaborate with workers to designate effective means of communicating important COVID-19 information.

### *Personal Protective Equipment*

During an outbreak of COVID-19, recommendations for PPE specific to occupations or job tasks may change depending on geographic location, updated risk assessments for workers, and information on PPE effectiveness in preventing the spread of COVID-19.

The Company will check the OSHA, CDC, and state websites regularly for updates about recommended PPE. The company will adhere to all state and federal mandated guidelines for PPE. Additional PPE is not recommended for workers in the lower exposure risk group. Workers should continue to use the PPE, if any, that they would ordinarily use for other job tasks. Employees may use cloth or other masks in the event that effective social distancing cannot be regularly followed because of work requirements.

### **ADDITIONAL LEGAL REQUIREMENTS AND EXCEPTIONS**

For a reference information, please see Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19, at <https://www.cdc.gov/coronavirus/2019-ncov/downloads/critical-workers-implementing-safety-practices.pdf> and Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19) <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>.

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