

USUI INTERNATIONAL CORPORATION

**COVID-19 Preparedness, Response
and Vaccination Plan**

DEVELOPED APRIL 20, 2020 AND PERIODICALLY REVISED
INTRODUCTION

Usui International Corporation (hereinafter “Company”) takes the health and safety of our workers very seriously. The coronavirus or “COVID-19,” is a respiratory disease caused by the SARS-CoV-2 virus. The Company is committed to establishing practices to mitigate COVID-19’s impact and taking other actions as required by law. In order to promote safety and maintain operations, we developed and initially implemented this COVID-19 Preparedness, Response and Vaccination Plan (“Plan”) 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 and for subsequent updates, on information available from the U.S. Department of Health and Human Services’ Centers for Disease Control and Prevention (“CDC”), information and standards issued by the U.S. Department of Labor’s Occupational Safety and Health Administration (“OSHA”), and existing 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, and any changes in state issued orders. The Company may also amend this Plan based on operational needs.

USUI INTERNATIONAL CORPORATION

TABLE OF CONTENTS

RESPONSIBILITIES OF MANAGERS AND SUPERVISORS..... 3

RESPONSIBILITIES OF EMPLOYEES..... 3

BASIC INFECTION PREVENTION MEASURES 3

POLICIES AND PROCEDURES FOR PROMPT IDENTIFICATION AND
ISOLATION OF SICK PEOPLE 4

WORKPLACE FLEXIBILITIES AND PROTECTIONS 6

EXISTING OSHA STANDARDS 7

VACCINATION, WEEKLY TESTING, AND FACE COVERING POLICY 7

CONTINGENCY PLANS 11

LEVEL OF RISK OF OCCUPATIONAL
EXPOSURE..... 12

PROTECTING WORKERS WITH JOBS AT LOWER EXPOSURE RISK (CAUTION) 12

ADDITIONAL LEGAL REQUIREMENTS AND EXCEPTIONS..... 13

USUI INTERNATIONAL CORPORATION

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:

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

USUI INTERNATIONAL CORPORATION

- Assesses remote work options if operationally feasible for certain segments of the workforce, 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.
- Maintains distances of six feet among one another between workers, customers, and worksite visitors to the maximum extent possible.
- Evaluates administrative or other engineering controls to maintain distances between work stations of at least 6 feet to the maximum extent possible.
- Modifies 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.
- Enhances 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")).

The Company also strongly encourages all employees to consider receiving full vaccination for COVID-19, including receiving a booster shot if eligible. Regardless of Covid-19 variant, vaccination continues to significantly reduces the chances of infection, the length and severity of an infection, and the potential that a person will transmit the virus to others.

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:

- The Company will follow current CDC Guidance. It will update identification and isolation procedures as CDC Guidance changes. Time off from work may vary depending on whether the worker has tested positive for COVID-19, is experiencing symptoms, or has been in close contact with people who have tested positive or experiencing symptoms.
- 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, severe headache, 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.

USUI INTERNATIONAL CORPORATION

- Workers testing positive for COVID-19 or demonstrating principal symptoms of COVID-19, such as fever, atypical cough, atypical shortness of breath, severe headache, or fatigue **must not report for work regardless of vaccination status.**
 - Such workers must notify their manager or supervisor immediately.
- **Workers with a confirmed COVID-19 test or who show symptoms of COVID-19** are to isolate for 5 days. To calculate the 5-day period, day 1 is the first full day of the positive test if there are no symptoms or the first full day after symptoms develop. Workers may return to work as follows:
 - After 5 full days if the worker has no symptoms.
 - After 5 full days if the worker is fever-free for 24 hours without the use of fever-reducing medication and other symptoms have improved (loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation).
 - If the worker continues to have fever or other symptoms have not improved after 5 days, the worker should not return to work until fever-free for 24 hours without the use of fever-reducing medication and other symptoms have improved.
 - Workers should continue to wear a face covering at work for 5 additional days (day 6 through day 10) after the end of the off work period.
- Workers who 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, severe headache, or fatigue) are also subject to time periods where they may not come into work.
 - Instead, such workers must notify their manager or supervisor and Human Resources right away.
- If a worker comes into close contact with someone with COVID-19, the worker must not come into work if in one of the following groups:
 - Unvaccinated or have not completed a primary vaccine series (two doses of Pfizer or Moderna, or one dose of Johnson & Johnson).
 - Have completed the primary series of recommended vaccine, but have not received a recommended booster shot when eligible.
 - Received the single-dose Johnson & Johnson vaccine over 2 months ago and have not received a recommended booster shot.
- If any of the three situations above apply, the worker must stay off work for 5 days after the last day of close contact with a person who has COVID-19.
- If no symptoms occur, the worker must get tested on the 5th day after the last close contact with someone with COVID-19. The worker is to return to work if the test result is negative.
- If the test result positive the worker must be off work for 5 days from the date of the positive test if there are no symptoms. The worker will be off work for 5 days after the date symptoms begin if the worker develops COVID-19 symptoms.
- For 10 days after the last close contact with someone with COVID-19, watch for fever cough, shortness of breath, severe headache, or other COVID-19 symptoms.
- If the worker is unable to get a test 5 days after last close contact with someone with COVID-19, the worker can return to work after 5 days if without any COVID-19 symptoms throughout the 5-day period.

USUI INTERNATIONAL CORPORATION

- If the worker develops symptoms, the worker is to get tested immediately and be off work pending the results of the test and/or improvement of symptoms as provided under this policy.
- 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 while in the workplace, including providing a face mask, if feasible and available, and requiring the person to wear it until the person is able to leave the workplace.
- 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.
 - 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

USUI INTERNATIONAL CORPORATION

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.
 - Confirming employee vaccination status and retaining appropriate records. Reminding employees who are not fully vaccinated of the requirements of this policy.

EXISTING OSHA STANDARDS

While there is no specific OSHA standard covering exposure to COVID-19 itself, effective November 5, 2021 OSHA issued an Emergency Temporary Standard (ETS) establishing minimum requirements for employee vaccination, face covering, and testing for employers like the Company. The ETS applies to the Company and all of our employees. The Company has incorporated the following Vaccination, Face Coverings, and Testing Policy into this Plan.

USUI INTERNATIONAL CORPORATION

VACCINATION, WEEKLY TESTING, AND FACE COVERING POLICY

Purpose

OSHA's ETS recognizes that vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation as a whole.

The Company strongly encourages all employees to receive a full COVID-19 vaccination to protect themselves, other employees, and family members. Vaccination also helps protect customers or others who visit our facilities. Employees who choose not to be vaccinated, or who may ask for and receive an accommodation from the vaccination, must comply with the sections on testing and face coverings.

Fully Vaccinated Status

Employees are fully vaccinated two weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses. For example, this includes two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, and two weeks after a single-dose vaccine, such as Johnson & Johnson's vaccine, or two weeks after the second dose of any combination of two doses of different COVID-19 vaccines as part of one primary vaccination series.

Any employee that chooses to be vaccinated against COVID-19 must complete the full course of vaccination no later than January 4, 2022. Any employee who has not completed the full course of vaccination by January 4, 2022 will be subject to the regular testing and face covering requirements of the policy.

To be fully vaccinated by the January 4, 2022 deadline, an employee must:

- Obtain the first dose of the Pfizer-BioNTech Covid-19 vaccine by November 30, 2021, or the first dose of the Moderna COVID-19 vaccine by November 23, 2021 and the second dose of either no later than December 21, 2021; or
- Obtain one dose of a single dose vaccine no later than December 21, 2021.

Employees will qualify as fully vaccinated two weeks after receiving the requisite number of doses of a COVID-19 vaccine as stated above. An employee will be considered partially vaccinated if they have received only one dose of a two-dose vaccine.

Time Off To Get Fully Vaccinated And Cost

All employees will be granted up to 4 hours of paid time off to receive the vaccination. In addition, all employees will be provided with time off, up to 2 days, to recover from an vaccine-related side effects after receiving a first and/or second dose. Employees are to work with their managers to schedule needed time off to get vaccinated.

USUI INTERNATIONAL CORPORATION

COVID-19 vaccinations are free of charge. It does not matter if the individual has health insurance coverage or not. A vaccine provider may bill an employee's health insurance for administering the vaccine, there is no out-of-pocket cost to an employee to get the vaccine.

Employees Who Are Not Fully Vaccinated

All employees who are not fully vaccinated as of January 4, 2022 and who report to a Company location at least once every seven days must as a condition of working: (1) undergo weekly COVID-19 testing; (2) receive a negative test; and (3) wear a face covering when in the workplace.

Weekly Testing

Employees subject to weekly testing must do the following in order to work:

- No later than Tuesday of each week be tested for COVID-19 so that the employee is tested every seven days.
- Provide documentation of each COVID-19 test result to Human Resources at each seven day interval.
- The COVID-19 test result must be negative.

Any employee who does not report to the workplace during a period of seven or more days (e.g., if they were traveling for two weeks or working remotely prior to reporting to the workplace) must:

- Be tested for COVID-19 within seven days prior to returning to the workplace.
- Provide documentation of a negative test result to Human Resources upon return to the workplace.

If an employee does not provide documentation of a negative COVID-19 test result as required by this policy, they will be removed from the workplace until they provide a negative test result.

Employees who test positive for COVID-19 will be subject to the time off from work periods described elsewhere in this policy.

Employees who have received a positive COVID-19 test, or have been diagnosed with COVID-19 by a licensed healthcare provider, are not required to undergo COVID-19 testing for 90 days following the date of their positive test or diagnosis once they are cleared to return to work.

Employees found to have provided false documentation will be subject to termination of employment.

Face Covering

Employees who are not fully vaccinated and produce a negative COVID-19 test each week must also wear a face covering in the workplace.

USUI INTERNATIONAL CORPORATION

Face coverings must: (i) completely cover the nose and mouth; (ii) be made with two or more layers of a breathable fabric that is tightly woven (i.e., fabrics that do not let light pass through when held up to a light source); (iii) be secured to the head with ties, ear loops, or elastic bands that go behind the head. If gaiters are worn, they should have two layers of fabric or be folded to make two layers; (iv) fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face; and (v) be a solid piece of material without slits, exhalation valves, visible holes, punctures, or other openings.

Acceptable face coverings include clear face coverings or cloth face coverings with a clear plastic panel that, despite the non-cloth material allowing light to pass through, otherwise meet these criteria and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker's mouth or facial expressions to understand speech or sign language respectively.

An exception may be made to the wearing of face coverings when:

- When an employee is alone in a room with floor to ceiling walls and a closed door.
- For a limited time while an employee is eating or drinking at the workplace or for identification purposes in compliance with safety and security requirements.
- When an employee is wearing a respirator or facemask.
- If the Company determines that the use of face coverings is infeasible or creates a greater work hazard (e.g., when it is important to see the employee's mouth for reasons related to their job duties or when the use of a face covering presents a risk of serious harm to the employee).

Reporting And Verification Of Vaccination Status

All employees are required to report their vaccination status and, if vaccinated, provide proof of vaccination. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if not fully vaccinated, their weekly test results. Employees who do not comply with this policy will be subject to discipline.

Employees who are fully vaccinated must provide proof of vaccination to the Company. Any of the following are sufficient to show vaccinated status:

- The record of immunization from a health care provider or pharmacy;
- A copy of the COVID-19 Vaccination Record Card;
- A copy of medical records documenting the vaccination;
- A copy of immunization records from a public health, state, or tribal immunization information system; or
- A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine(s).

USUI INTERNATIONAL CORPORATION

Employees must certify that the vaccinated documentation they are submitting is true and correct. Employees found to have provided false documentation will be subject to termination of employment.

If an employee is unable to produce one of these acceptable forms of proof of vaccination despite attempts to do so (e.g., by trying to contact the vaccine administrator or state health department), the employee can provide a signed and dated statement attesting to their vaccination status (fully vaccinated or partially vaccinated) an employee may submit an attestation that they have lost and are otherwise unable to produce one of the other forms of acceptable proof which includes the following language:

“I declare (or certify, verify, or state) that this statement about my vaccination status is true and accurate. I understand that knowingly providing false information regarding my vaccination status on this form may subject me to criminal penalties.”

An employee who attests to their vaccination status in this way will also be asked, to the best of their recollection, for the type of vaccine administered, the date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine.

Employees found to have provided false documentation will be subject to termination of employment.

Accommodations

Employees may request an exception from vaccination requirements (if applicable) if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination.

Employees may request a reasonable accommodation if they cannot be vaccinated and/or wear a face covering (as otherwise required by this policy) because of a legally covered disability, or if receiving a COVID-19 vaccine, and/or wearing a face covering, conflict with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be submitted in writing to Human Resources by December 7, 2021 All such requests will be handled in accordance with applicable laws and regulations.

New Hires

All new employees are required to comply with the vaccination, testing, and face covering requirements outlined in this policy as soon as practicable and as a condition of employment. Potential candidates for employment will be notified of the requirements of this policy prior to the start of employment.

Exposure

See pages 4-6 of this policy for further direction.

USUI INTERNATIONAL CORPORATION

If an “up-to-date” vaccinated employee (an employee who has received the completed primary series and booster) has had close contact to a person who has tested positive for COVID-19, the employee may continue working and no time off is required.

If the employee is not “up-to-date” with a vaccination and has had close contact to a person who has tested positive for COVID-19 or experiencing symptoms of COVID-19, the employee is required to stay home for the periods listed on pages 4-6 of this policy.

Employees may choose to use any available PTO while in the 14 day quarantine. If no time is available the time will be unpaid. Upon the employee’s return to work negative test result must be provided.

Confidentiality and Privacy

All medical information collected from individuals, including vaccination information, test results, and any other information obtained as a result of testing, will be treated in accordance with the Company’s policies and all applicable laws and policies on confidentiality and privacy.

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)

USUI INTERNATIONAL CORPORATION

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:

- 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.
- 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 INFORMATION

For a reference information regarding COVID-19, please see the Centers for Disease Control and Prevention COVID-19 website at <https://www.cdc.gov/coronavirus/2019-ncov/index.html>.

USUI INTERNATIONAL CORPORATION

4865-3474-9449 v1 [21191-57]