



TREYSTAR™

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COVID-19 PREPAREDNESS & RESPONSE PLAN

Revised October, 2020

Decision Making Standard

Ensure business continuity and delivery of first-class service while demonstrating care for employees and client welfare, reducing the risk of exposure to and spread of COVID-19, and fulfilling the mission and/or vision of Treystar, Inc. and its affiliates (together, the “Company”).

Telework Contingency Plan

Due to the COVID-19 pandemic and any pertinent corresponding executive or emergency orders (coupled with certain directives from the federal, state and local municipalities and/or health departments as applicable), employees may work remotely or on an agreed upon limited schedule as approved by management. Remote work may become necessary for those who need to stay home with their children if there are school or childcare closures, or to care for elderly or sick family members (employees must consult with direct supervisor).

In the case of a mandated shut down of the workplace, management and employees will work together to determine individual remote or “essential” work schedules. If an employee is required to come into the office to complete “essential” services, he/she agrees to follow directives of the CDC, such as proper hand sanitation, social distancing, wearing masks, etc. (as further defined herein).

The COVID-19 Preparedness Plan addresses:

- Engineering
- Administrative Controls
- Hand Hygiene and Environmental Surface Disinfection
- Personal Protective Equipment
- Health Surveillance
- Notification of Employee’s COVID-19 Diagnosis or Symptoms
- Return-to-Work Requirements
- Communications and Training

Engineering

- If possible, maximize circulation of outdoor air by opening windows and doors and using fans.
- Ensure that ventilation system in the office is operating properly.
- Ensure that all water systems are safe to use after any prolonged office shutdown.

Exposure Determination

The Company has determined that its employees’ jobs fall into only the lower exposure and medium exposure risk categories as defined by OSHA.

- **Lower Exposure Risk Jobs:** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (i.e., within six feet) with the general public. Employees in this category have minimal occupational contact with the public and other employees. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with employees and the public.
- **Medium Exposure Risk Jobs:** These jobs are those that require frequent or close contact (i.e., within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients and/or have frequent contact with the public and other employees. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments.

Management verifies that the Company has no high-risk exposure jobs. High exposure risk jobs have a high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities. Note that certain affiliates of the Company have their own preparedness plans that are based upon the type of business as well as corresponding governmental mandates or health and safety guidelines.

Administrative Controls

Desks and workstations, as well as shared equipment (i.e., copiers and shredders) are to be arranged or scheduled to allow all employees to stay at least 6 feet apart. If you are unable to maintain 6 feet between yourself and other employees, please let us know. This office has a designated COVID-19 safety coordinator to whom you can address any questions. The COVID-19 safety coordinator for the office located at **241 E. Michigan Avenue, Suite 135, Kalamazoo, MI 49007** is **Bob Brown, Jr.**

All **visitors** should be first directed to **the sign-in station**. Upon arrival, all visitors shall do a temperature check and complete the Company's screening questionnaire.

The screening questionnaire will ask a **visitor** the following screening questions:

1. Are you under evaluation for COVID-19 (i.e., waiting for the results of a test)?
2. Do you currently have a temperature that is elevated for you or is 100° or greater?
3. Do you currently have symptoms such as a cough, chills, sweats, shortness of breath, chest tightness, vomiting, nausea or a sore throat?
4. In the past 14 days, have you had close contact with an individual diagnosed with COVID-19? ("Close contact" means within 6 feet of an infected person for at least 15 minutes starting 2 days before illness onset.)

(Any **visitor** answering "yes" to any of these questions should be denied entry.)

Basic Infection Prevention Measures

The COVID-19 safety coordinator affirms that any shared touched surfaces (i.e., door handles, supply cabinets, shared equipment such as copiers, etc.) are cleaned and disinfected frequently.

All employees are responsible for observing the following infection control procedures and for encouraging visitors to do the same:

- Wash hands often and thoroughly (scrubbing them for at least 20 seconds). Utilize hand sanitizer if soap and water are not immediately available.
- Avoid physical contact with others and direct co-employees and visitors to maintain a distance of at least 6 feet where possible.
- Cover your cough – cough or sneeze into the crook of your arm, or into a disposable tissue, and thoroughly wash your hands.
- Avoid touching your face.
- Wear a mask or other face covering in all places where you cannot be 6 feet apart (i.e., common areas such as restrooms and hallways).
- Avoid shaking hands with people. Do not share personal items such as phones, pens or tablets.
- Limit visits and in-person meetings to those that are necessary and cannot reasonably be done remotely.
- Minimize movement throughout the office and stagger lunch and break times to avoid gatherings.

Personal Protective Equipment

Personal protective equipment (PPE) is available in the office for all employees and visitors. Supplies include hand sanitizer, soap, non-medical grade face coverings, and cleaning and sanitizing products.

Health Surveillance

Employees should self-monitor for signs and symptoms of COVID-19. Employees must promptly report any signs and symptoms of COVID-19 experienced during the work shift. The Company will not discharge, discipline or otherwise retaliate against employees who stay home or who leave work when they are at particular risk of infecting others with COVID-19.

The following policies and procedures are being implemented to assess employees' health status prior to entering the office and for employees to report when they are sick or experiencing symptoms. Each employee shall do a temperature check and is provided with a screening questionnaire at **the sign-in station**, which shall be completed at the start of each workday.

The screening questionnaire will ask an **employee** the following screening questions:

1. Are you under evaluation for COVID-19 (i.e., waiting for the results of a test)?
2. Do you currently have a temperature that is elevated for you or is 100° or greater?
3. Do you currently have symptoms such as a cough, chills, sweats, shortness of breath, chest tightness, vomiting, nausea or a sore throat?
4. In the past 14 days, have you had close contact with an individual diagnosed with COVID-19? ("Close contact" means within 6 feet of an infected person for at least 15 minutes starting 2 days before illness onset.)

(If an **employee** answers “yes” to any of these questions or is otherwise not feeling well, the employee must immediately leave the premises and stay home until further notice. Contact **Bob Brown, Jr.**)

Notification of Employee’s COVID-19 Diagnosis and/or Symptoms

An employee with a positive COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from the worksite and self-isolate per the CDC guidelines.

In response to a confirmed diagnosis or display of COVID-19 symptoms, the Company shall:

- Immediately notify the public health department;
- Within 24 hours, notify any employees and visitors who may have come into contact with the diagnosed/symptomatic employee;
- Keep confidential the identity of the diagnosed/symptomatic employee; and
- Close the office as necessary to conduct deep cleaning of the diagnosed/symptomatic employee’s workstation, as well as those common areas potentially infected by the employee.

The visitor and employee screening questionnaire will be used to help identify those persons who may have been in sustained, close contact with the diagnosed/symptomatic employee.

Return-to-Work Requirements

A. Employee *thinks or knows* he/she had COVID-19 and has experienced symptoms:

Employee can return to work after:

- At least 10 days have passed since symptoms first appeared; **and**
- Is no longer infectious according to the latest guidelines from the CDC; **and**
- 24 hours with no fever without fever-reducing medications; **and**
- *Other symptoms of COVID-19 are improving.

**Loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation.*

Most people do not require testing to decide when they can be around others; however, if a healthcare provider recommends testing, they will let an employee know when he/she can resume being around others based on the test results.

Note that the aforesaid CDC recommendations **do not** apply to persons with severe COVID-19 or with severely weakened immune systems (immunocompromised). These persons should follow the CDC guidance below for “Employee was severely ill with COVID-19 or have severely weakened immune system (immunocompromised) due to a health condition or medication.”

B. Employee was severely ill with COVID-19 or has a severely weakened immune system (immunocompromised) due to a health condition or medication:

Employees who are severely ill with COVID-19 might need to stay home longer than 10 days and up to 20 days after symptoms first appeared. Employees who are severely immunocompromised may require testing to determine when they can be around others. Testing may be recommended by employee’s healthcare provider. Employees shall consult with his/her healthcare provider as to when they can resume being around other people based on the results of testing.

C. Employee tested positive for COVID-19, but has no symptoms:

If employee continues to have no symptoms, employee can return to work after self-isolating for 10 days following a positive viral test for COVID-19. Most people do not require additional testing to decide when they can be around others; however, if a healthcare provider recommends testing, they will let an employee know when he/she can resume being around others based on the test results.

If employee develops symptoms after testing positive, follow the CDC guidance above for “Employee *thinks or knows* he/she had COVID-19 and has experienced symptoms” before returning to work.

D. Any employee who has been around a person with COVID-19:

Any employee who has had close contact with someone with COVID-19 should stay home for 14 days **after their last exposure** to that person or as further determined by the CDC. “Close contact” means someone who was within 6 feet of an infected person for at least 15 minutes starting 2 days before illness onset.

However, an employee who has had close contact with someone with COVID-19 and who meets the following criteria does **NOT** need to stay home:

- Has had COVID-19 illness within the previous 3 months; **and**
- Has recovered; **and**
- Remains without COVID-19 symptoms.

In addition, an employee who had been in close contact with someone with COVID-19, but has had a negative viral test for COVID-19 within 1 to 5 days following their last exposure to that person, **plus** has not had any COVID-19 symptoms, may be allowed back to work.

E. Any employee who experiences illness other than COVID-19:

Any employee who experiences an illness other than COVID-19 (i.e., the flu, bronchitis, etc.) shall remain home for at least 2 days. The employee is expected to notify his/her direct supervisor promptly.

Communications and Training

This revised COVID-19 Preparedness & Response Plan was communicated to all employees on November 11, 2020, as well as copies of the reference materials, as outlined below in Exhibit A, were provided. The necessary training shall be provided on November 16, 2020. Management and employees shall work through this revised plan together and update the training as necessary.

This revised COVID-19 Preparedness & Response Plan has been certified by management, posted in the office copy room and in the COVID-19 Handbook on November 11, 2020. It will be updated as necessary.

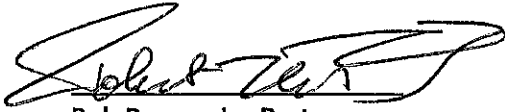
To report health and safety concerns in the workplace, go to [Michigan.gov/MIOSHAcomplaint](https://www.michigan.gov/MIOSHAcomplaint).

For emotional-support services, go to [Michigan.gov/StayWell](https://www.michigan.gov/StayWell).

Recordkeeping

A record of the following shall be kept for one year from the time of its generation: 1) COVID-19 employee training; 2) screening questionnaires for each employee or visitor entering the workplace; and 3) notifications associated with confirmed cases of COVID-19 in the workplace.

Certified by:

A handwritten signature in black ink, appearing to read "Bob Brown, Jr.", written in a cursive style.

Bob Brown, Jr., Partner

EXHIBIT A

REFERENCE MATERIALS

References include the following and are attached hereto:

- Michigan Department of Health and Human Services (MDHHS) – Extends Emergency Orders
 - MDHHS Emergency Order (10/29/20)
 - MDHHS Epidemic Order Infographic (10/29/20)
 - MDHHS Epidemic Order Fact Sheet (10/29/20)

- Michigan Occupational Safety and Health Administration (MIOSHA)
 - COVID-19 MIOSHA Emergency Rules Fact Sheet
 - COVID-19 MIOSHA Emergency Rules filed with the State 10/14/20
 - COVID-19 Guidelines for Offices (Summary of MIOSHA Emergency Rules)

- Department of Health and Human Services (OSHA)
 - Guidance on Preparing Workplaces for COVID-19

- Centers for Disease Control and Prevention (CDC)
 - When You Can be Around Others After You Had or Likely Had COVID-19 (dated 9/10/20)
 - Similarities and Differences between Flu and COVID-19 (dated 10/6/20)
 - Basic dos and don'ts for Employees to prevent workplace violence (handout)
 - Guidance for Cleaning and Disinfecting – Public Spaces, Workplaces, Businesses, Schools and Homes (dated 9/16/20)

- BOMA International
 - Managing Through Pandemics – Preparing Your Buildings, Tenants and Staff
 - Getting Back to Work 2.0: Building Re-Entry Best Practices in a COVID-19 Reality (dated 10/23/20)

- Internal Documents (Treystar)
 - Office Building Cleaning (dated 10/30/2014); discussed on 5/29/20 to sanitize 2 times daily
 - Posted Office Guidelines
 - Posted Building Guidelines for Common Areas