

ADVANTAGE ELECTRIC

COVID-19 Exposure Prevention, Preparedness, And Response Plan for Construction 5.26.2020

The purpose of this Plan is to outline the steps that we all can take to reduce the risk of exposure to COVID-19. The Plan describes how to prevent worker exposure to coronavirus, protective measures to be taken on the jobsite, personal protective equipment and work practice controls to be used, cleaning and disinfecting procedures, and what to do if a worker becomes sick.

ADVANTAGE ELECTRIC 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, we all must remain vigilant in mitigating the outbreak. This is particularly true for the construction industry, which has been 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 throughout the Company and on all our jobsites. We have also identified a team of employees to monitor available U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) guidance on the virus.

This Plan is based on currently available information from the CDC and OSHA, and is subject to change based on further information provided by the CDC, OSHA, and other public officials.

I. 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 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

We are 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, we all must play our part. As set forth throughout this Plan, the Company has instituted various sanitation, social distancing, and other best practices on our jobsites that must be adhered to. 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 Douglas Rexroat.

OSHA and the CDC have provided the following control and preventative guidance to 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:

- 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 healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your 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

- ADVANTAGE ELECTRIC has designated Douglas Rexroat, Matt Ockert, Shannon McMillon, Mike Beaver and all Foreman and Journeyman as COVID-19 supervisors. One of the above named shall be present on each jobsite at all times and must enforce the precautionary measures contained in this Plan. If you are working alone, you are designated as the jobsite COVID-19 supervisor. It is critical that all employees make themselves knowledgeable of the requirements of this document.
- Employees who have CDC-recognized symptoms of COVID-19 shall notify their supervisor and stay home. Any employee showing symptoms of COVID-19 on site will be immediately quarantined and required to leave the jobsite to seek proper medical treatment.
- Safety Stand-Downs/Toolbox Talks will be required on all job sites and must detail the protective measures in place for all workers. A minimum of six (6) feet of separation must be maintained between all employees at these meetings. Employees must be provided copies of the “COVID-19 Toolbox Talk” and “COVID-19 Prevention and Work Practice Controls” documents attached herein on the first day back to work.

- The COVID-19 supervisor(s) will provide training to employees that covers, at a minimum: 1) workplace infection-control practices; 2) proper use of personal protective equipment; 3) the steps an employee must take to notify the company of any symptoms of COVID-19, or a suspected or confirmed case of COVID-19; and 4) how to report unsafe working conditions. **The Company must keep records of this training.**
- The Company will create a dedicated entry point at every worksite, if possible, for daily screening as called for in this plan.
- The Company will maintain a daily attendance log of all employees on jobsites in a manner which enables rapid contact tracing between employees in the event an employee on a jobsite tests positive for COVID-19. Attendance will be collected verbally and the foreman/superintendent will sign in each employee. During attendance, employees need to verify that they have self-screened before entering the work site as required in this document. If you have not self-screened, you will be screened by your supervisor or sent home at their discretion. Every employee will be issued a self-screening log which must be updated every day they are working and turned in weekly with their timecard. If thermometers are used on the job, they must be non-contact thermometers. **The Company must keep records of employee screenings.**
- Employees must avoid physical contact with others and direct employees/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.
- Employees will be prohibited from congregating during scheduled break times. A minimum of six (6) feet of separation must be maintained amongst all employees during breaks.
- The Company will identify choke points and high-risk areas where workers must stand near one another (such as hallways, hoists and elevators, break areas, water stations, and buses) and control their access and use so that social distancing is maintained.
- The Company will provide soap and running water on all jobsites for frequent handwashing. In the event running water is not obtainable on a jobsite, the Company will provide alcohol-based hand sanitizers with a minimum of 60% ethanol or 70% isopropanol.
- Employees should limit the use of coworkers' tools and equipment. To the extent tools must be shared, the Company will provide EPA List N cleaning/sanitation products to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- If practicable, employees should use/drive the same truck or piece of equipment every shift.
- In lieu of using a common source of drinking water, such as a cooler, employees must use individual water bottles.

B. Workers entering Occupied Building and Homes

- When employees perform construction and maintenance activities within occupied homes, office buildings, and other establishments, these work locations present unique hazards with regards to COVID-19 exposures. All such workers should evaluate the specific hazards when determining best practices related to COVID-19.
- Prior to sending employees to a customer's home or business, the employer should inquire as to whether any resident or occupant of the structure has been exposed to COVID-19 or is exhibiting symptoms. In addition, upon arrival at a customer's home or place of business, the employee shall make the same inquiries.
- During this work, employees must sanitize the work areas upon arrival, throughout the workday, and immediately before departure. The Company will provide EPA List N cleaning/sanitation products for this process.
- Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum. Employees should wash or sanitize hands immediately before starting and after completing the work.
- Employees should wear non-medical grade face coverings at all times while in an occupied home or business, and customers should be encouraged to wear the same when interacting with employees.

C. 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 possible and a minimum of six (6) feet of separation must be maintained between employees and delivery personnel.

D. Personal Protective Equipment and Work Practice Controls

- The Company must provide instructions for the distribution and proper use of personal protective equipment (PPE), as well as designate on-site locations for the disposal of soiled PPE.
- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide:
 - Masks: The Company must provide, at a minimum, non-medical grade face coverings to their employees on all jobsites. These items must be worn when workers cannot consistently maintain a minimum of six (6) feet of separation.
 - **NOTE:** The CDC and State of Michigan are currently recommending that N95 masks be reserved for health care professionals, first responders, and other critical workers.
 - Gloves: Gloves should be worn at all times, where appropriate, to prevent skin contact with contaminated surfaces. The type of glove worn should be appropriate to the task. If gloves are not typically required for the task, then any type of glove is acceptable, including latex gloves.
 - Eye protection: Eye protection must be worn at all times while on site.
- 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.
- Institute a rigorous housekeeping program to reduce dust levels on the jobsite.

IV. Job Site Cleaning and Disinfecting

The Company has instituted regular housekeeping practices, which includes 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 will be issued proper personal protective equipment (“PPE”), such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC.

- Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Any portable jobsite toilets provided by the Company should be cleaned regularly during the workweek and disinfected on the inside. 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.
- If an employee has tested positive for COVID-19, the Company will clean and disinfect those areas of the jobsite that a confirmed-positive individual may have come into contact with before employees can access that workspace again. The Company will also notify contractors or owners of any confirmed COVID-19 cases among its workers.
- The Company will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA List N household disinfectant;
 - Alcohol solution with at least 60% alcohol; or
 - Diluted household bleach solutions (these can be used if appropriate for the surface).

V. Jobsite Exposure Situations

*****When an employee is identified with a confirmed case of COVID-19, the company shall do both of the following within 24 hours: 1) notify the local public health department; and 2) notify any co-workers, contractors, or suppliers who may have come in contact with the person with a confirmed case of COVID-19. The Company must keep records of these notifications as required by Executive Order 2020-97, or any subsequent executive order that maintains this recording requirement.** If the Company learns that an employee has tested positive, the Company will conduct an investigation into co-workers that may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals that have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with the carrier.

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 also self-quarantine for 14 days from the last date of close contact with the carrier.

If an employee has tested positive for COVID-19, the Company will clean and disinfect those areas of the jobsite that a confirmed-positive individual may have come into contact with before employees can access that workspace again. The Company will also notify contractors or owners of any confirmed COVID-19 cases among its workers.

- **Employee Exhibiting COVID-19 Symptoms**

Employees who exhibit COVID-19 symptoms and were directed to care for themselves at home may discontinue isolation under the following conditions:

- Resolution of a fever without the use of fever-reducing medications; **and**
- Improvement in respiratory symptoms (e.g. cough, shortness of breath); **and**
- Negative results of an FDA Emergency Use Authorized COVID-19 molecular assay for detection of SARS-CoV-2 RNA from at least two consecutive respiratory specimens collected ≥ 24 hours apart (total of two negative specimens).

To the extent practical, employees are required to obtain a doctor's note clearing them to return to work.

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

An employee that 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 10 (10) days have passed since the date of his or her first positive test, and they have not had a subsequent illness. Employees that 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;¹ and (2) at least ten (10) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. The Company may require an employee to provide documentation clearing their return to work.

- **Employee Has Close Contact with a Tested Positive COVID-19 Individual**

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

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 not a confirmed diagnosis), the recordability analysis would not necessarily be triggered at that time.

¹ Recovery is defined as: (1) resolution of fever with the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

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, 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 occurring.

VIII. 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 of an employee's condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the employee and to detect situations where the potential for transmission may increase. A sample notice to employees is attached to this Plan. The Company reserves the right to inform other employees that a co-worker (without disclosing the person's name) 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.

IX. 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 Douglas Rexroat.