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INFECTIOUS DISEASE PREPAREDNESS AND RESPONSE PLAN

Purpose

This Infectious Disease Preparedness and Response Plan (the "Plan") is a guide for planning for, responding to, and recovering from an infectious disease outbreak that may impact our business and community. In this Plan, we identify: (1) potential occupational exposure to infectious disease; (2) ways to mitigate the risk of exposure to infectious disease in the workplace, and (3) our response if exposure incidents occur in the workplace.

Scope

An infectious disease is transmitted either by inhalation of infectious particles/droplets or direct contact of the particles/droplets with mucous membranes in the respiratory tract or eyes. Infectious diseases may include the Novel Coronavirus (COVID-19), MERS, SARS, Ebola, Anthrax, pandemic flu, and other known diseases.

During an outbreak of a highly infectious disease, the US Government – US Department of Health and Human Services (HHS) along with the Centers for Disease Control and Prevention (CDC) - is the national leader for overall communication and coordination efforts. They also work closely with the World Health Organization (WHO). The Company will follow the recommendations of these organizations as well as the Occupational Safety and Health Administration (OSHA), and other applicable federal, state, and local health authorities.

Infectious disease outbreaks are fast developing, and the guidance and standards published by applicable federal, state, and local health authorities may change by the hour and may vary by location. Accordingly, This Plan is considered a living document. It will be updated as often as necessary to ensure that the policies and procedures contained herein mirror the recommendations and requirements of the applicable federal, state, and local health authorities. Addendums to this Plan may be issued from time to time to address the Company's response to a specific ongoing threat. Addendums may be in the form of an email.

Plan Administrator

The Plan Administrator has the overall responsibility to administer the plan for the Company. The Plan Administrator's responsibilities include worker exposure risk classification, mitigation/worker protections, communication, training, reporting, recordkeeping, and confidentiality. The Plan Administrator may delegate his/her responsibilities to other individuals.

Katie Mann and **Contessa Hancock** are the Plan Administrators.

Contingency Plan for an Infectious Disease Outbreak

Potential Workplace Impact of Infectious Disease Outbreak

- Increased rates of employee absenteeism.

- A change to operational procedures that minimizes person-to-person contact at the workplace by:

    o Considering alternative ways to work (e.g., telework, remote meetings, etc.).

    o Cross-training workers across different jobs to cover essential functions and operations with a reduced workforce; and

- Interrupted supply chains or delayed deliveries.

Occupational Exposure to Infectious Diseases

Occupational exposure to infectious diseases means that there is work activity or work conditions that are reasonably anticipated to present an elevated risk of contracting these diseases when protective measures are not in place. Where appropriate, the Company will follow the recommendations of federal, state, and local health authorities to address considerations related to occupational exposure to infectious diseases including, but not limited to the following:

- Where, how, and to what sources of infection workers might be exposed including:

    o the general public, customers, and coworkers; and

    o sick individuals or those at particularly high risk of infections (e.g., local, state, national, and international travelers who have visited locations with widespread sustained (ongoing) disease transmission).

- To the extent permitted by law, an employee's individual risk factors that may increase the risk of severe illness (e.g., older age; medical conditions; pregnancy)

- Engineering, administrative, work practice, and personal protective equipment controls necessary to address those risks.

Workplace Controls

The best way to control a hazard is to systematically remove it from the workplace, rather than relying on workers to reduce their exposure. During an outbreak, when it may not be possible to eliminate the hazard, the most effective protection measures are (listed from most effective to least effective):

1. Engineering controls

2. Administrative controls

3. Safe work practices (a type of administrative control)

4. PPE

There are advantages and disadvantages to each type of control measure when considering the ease of implementation, effectiveness, and cost. In most cases, a combination of control measures will be necessary to protect workers from exposure.

Engineering Controls

Engineering controls involve isolating employees from work related hazards. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement. Engineering controls include:

- Installing high-efficiency air filters.

- Increasing ventilation rates in the work environment.

- Installing physical barriers, such as clear plastic sneeze guards.

Administrative Controls

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

- Requiring sick employees to stay at home.

- Implementing sick leave policies that are flexible and consistent with public health guidance and educating employees of these policies.

- Maintaining flexible policies that permit employees to stay home to care for a sick family member.

- Implementing flexible worksites (e.g., telework), if feasible.

- Implementing flexible work hours (e.g., staggered shifts), whenever possible, to limit the number of employees simultaneously working on-site if productivity is not affected.

- Implement flexible meeting and travel options, if feasible (e.g., using telephone or video conferencing instead of in person meetings; postponing non-essential meetings or events; etc.).

- Providing workers with up-to-date education and training on contagious disease risk factors and protective behaviors (e.g., cough etiquette and care of PPE).

- Training workers who need to use protective clothing and equipment on how to put it on, use/wear it, and take it off correctly, including in the context of their current and potential duties. Training material should be easy to understand and available in the appropriate language and literacy level for all workers.

- Discussing with subcontractors and companies that provide contract or temporary employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies.

Safe Work Practices

Safe work practices are types of administrative controls that include procedures for safe and proper work used to reduce the duration, frequency, or intensity of exposure to a hazard. Examples of safe work practices include:

- Providing resources and a work environment that promotes personal hygiene. For example, provide tissues, no-touch trash cans, hand soap, alcohol-based hand rubs containing at least 60 percent alcohol, disinfectants, and disposable towels for workers to clean their work surfaces.

- Requiring regular hand washing or use of alcohol-based hand rubs. Workers should always wash hands when they are visibly soiled, after removing any PPE, after using the restroom, and before eating.

- Posting handwashing signs in restrooms.

- Establishing policies and practices to increase the physical distance among and between employees and others if local, state, or federal health authorities recommend use of social distancing. Such policies and practices may include the use of verbal announcements, signage, or visual cues.

- Encouraging employees to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time in a common area, if local, state, or federal health authorities recommend use of social distancing. Accordingly, access to break rooms and other common areas should be closed or controlled to ensure that social distancing can be adhered to.

Personal Protective Equipment (PPE)

While engineering and administrative controls are considered more effective in minimizing exposure to contagions, PPE may also be needed to prevent certain exposures. While correctly using PPE can help prevent some exposures, it should not take the place of other prevention strategies.

Examples of PPE include the following: gloves, goggles, face shields or face masks, and respiratory protection, when appropriate. During an outbreak of an infectious disease, such as 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 the disease.

All types of PPE must be:

- Selected based upon the hazard to the worker.

- Properly fitted and periodically refitted, as applicable (e.g., respirators).

- Consistently and properly worn when required.

- Regularly inspected, maintained, and replaced, as necessary.

- Safely removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

Employers are obligated to provide their workers with PPE needed to keep them safe while performing their jobs. The types of PPE required will be based on the risk of being infected with the contagious disease while working and the job tasks that may lead to exposure.

Workers, particularly those performing aerosol-generating procedures, need to use respirators per National Institute for Occupational Safety and Health (NIOSH) standards.

IMPORTANT NOTICE: PPE refers to personal protective equipment that is addressed in specific OSHA standards, such as 29 CFR 1926 for the Construction Industry, and should not be confused with a face covering (generally, made of cloth) intended to be worn to slow the spread of an infectious disease. Face coverings will be addressed in an applicable Addendum.

Ways to Mitigate Risk of Exposure to Infectious Disease

Implementing Controls for Specific Viruses, Pathogens, or Infectious Diseases

During an infectious disease outbreak, the Company will implement engineering controls, administrative controls, and safe work practices designed to protect our employees from exposure to infectious diseases. Controls for specific viruses, pathogens, or infectious diseases that are currently present or are an ongoing threat on a specific site will be issued by the Plan Administrator(s) on an as-needed basis. When such controls are not sufficient, the Company shall provide PPE.

Identification and Isolation of Sick and/or Exposed Employees

Risk and exposure determinations are made without regard to employees protected characteristics as defined by local, state, and federal law.

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employee's personnel documentation.

Procedures for Minimizing Exposure from Outside of Workplace

The business practices of the Company are evaluated to ensure the safety and health of all individuals. Any individual entering one of the Company's jobsites may have their temperature checked and/or a questionnaire completed prior to entry.

- To the greatest extent possible, the Company will limit the number of visitors to its jobsites to those necessary for the work. Individuals, subcontractors, and vendors that are necessary for the work will be provided a copy of this Plan.

- Masks may be made available to visitors/vendors as well as appropriate disinfectants so individuals can clean work areas before and after use.

- Information will be posted at each jobsite (at each entrance, if feasible) educating individuals on ways to reduce the spread of the infectious disease.

Reporting Policies and Procedures

If an employee has been **knowingly exposed to**, **tested positive for**, or **is observed showing symptoms of an infectious disease**, the project leadership team shall take the following actions (in the following order):

1. Immediately isolate the employee by moving the employee to the designated isolation area (employee's vehicle). Once the employee has been isolated, his/her supervisor shall call the employee and fill out the **Initial Reporting Form**.

2. The supervisor shall then notify the Plan Administrator(s) at Katie (434) 455-3140 or Contessa (434) 455-3151.

3. The Plan Administrator(s) will determine the response required.

4. Decisions made by the Plan Administrator(s) will be communicated to the Corporate Safety Manager, Project Manager, and Project Superintendent, and implemented by the project leadership team.

Confidentiality

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.

NOTE: The Company has the obligation to perform contact tracing and notify other employees that they may have been exposed by a co-worker who has been diagnosed with an infectious disease so the employees may take measures to protect their own health. The name of an employee who has been diagnosed with an infectious disease will not be disclosed to his/her co-workers.

Communication

Infectious disease outbreaks can evolve rapidly. The Company will communicate to our employees as information becomes available on the following topics:

- Information about the infectious disease outbreak.

- Changes to our business operations including workplace policies, workplace protections, and flexibilities.

- Notifying affected employees if a co-worker in the facility has been confirmed infectious.

Training

All employees, regardless of risk exposure level, will be required to have training on the hazards and characteristics of the current infectious disease outbreak. This training will ensure that all employees recognize the hazards of the infectious disease as well as the procedures to minimize the hazards to help prevent the spread of the infectious disease.

The training will include the following information:

- The requirements of any applicable local or state government order or regulation pertaining to the infectious outbreak (the "Standard").

- The mandatory and non-mandatory recommendations in any CDC guidelines or applicable state guidance documents the employer is complying with, if any, in lieu of a provision of the Standard.

- The characteristics and methods of transmission of the infectious disease.

- The signs and symptoms of the infectious disease.

- Risk factors of severe illness for those with underlying health conditions.

- Awareness of the ability of pre-symptomatic and asymptomatic persons to transmit the infectious disease.

- Safe and healthy work practices, including but not limited to, physical distancing, wearing face coverings when physical distancing cannot be achieved, disinfection procedures, disinfecting frequency, ventilation, noncontact methods of greeting, etc.

- PPE:
  - When PPE is required.
  - What PPE is required.
  - How to properly don, doff, adjust, and wear PPE.
  - The limitations of PPE.
  - The proper care, maintenance, useful life, and disposal of PPE.

All employees in the workplace will be trained on this subject and procedures. All training will be certified and recorded in the Company's personnel files. The certification record shall contain:

- The name or unique identifier of the employee trained.

- The trained employee's physical or electronic signature.

- The date of the training.

- The name of the person who conducted the training.

The most recent training certification shall be maintained by the employer.

Retraining may be required in the following situations:

- Changes in the workplace, disease hazards exposed to, or job tasks performed render previous training obsolete.

- Changes are made to this Infectious Disease Preparedness and Response Plan.

- An employee's knowledge or use of workplace control measures indicate that the employee has not retained the essential components of the training.

Coronavirus Disease (COVID-19) Addendum

Coronavirus Disease 2019 (COVID-19) is primarily a respiratory disease caused by the SARS-CoV-2 virus. To reduce the impact of the COVID-19 outbreak to our workplace, the Company has developed this Addendum to our Infectious Disease Preparedness and Response Plan.

Signs and Symptoms of COVID-19

People with COVID-19 have had a wide range of symptoms reported – ranging from mild symptoms to severe illness. Symptoms may appear **2-14 days after exposure to the virus.** People with these symptoms may have COVID-19:

- Fever or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache

- New loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

The above list does not include all possible symptoms. Other people, referred to as asymptomatic cases, have experienced no symptoms at all.

How COVID-19 spreads

COVID-19 is thought to spread mainly from person-to-person, including:

- Between people who are in close contact with one another. Close contact is defined by the CDC as being within 6 feet of an infected person for at least 15 minutes starting from 2 days before illness onset until the time the infected person is isolated

- Through respiratory droplets produced when an infected person talks, coughs, or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

It may be possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes, but this is not thought to be the primary way the virus spreads.

People are thought to be most contagious when they are symptomatic. However, there is emerging evidence that people who are:

- pre-symptomatic (SARS-CoV-2 detectable before symptom onset); or

- asymptomatic (SARS-CoV-2 detectable but symptoms never develop)

can unknowingly spread COVID-19 to others. However, this is also not thought to be the main way the virus spreads.

With this in mind, best practice is to assume everyone you interact with has COVID-19 and take the necessary and appropriate precautions.

Worker Exposure Classifications for COVID-19

Worker exposure to an infectious disease like COVID-19 may be classified into four categories: very high, high, medium, and lower risk. Worker exposure classification depends in part on the industry type and the need for contact within 6 feet of people known to be, or suspected of being, infected with COVID-19. This division of risk is illustrated below by the Occupational Risk Pyramid developed by OSHA.

Occupational Risk Pyramid for COVID-19

Very High

High

Medium

Lower Risk (Caution)

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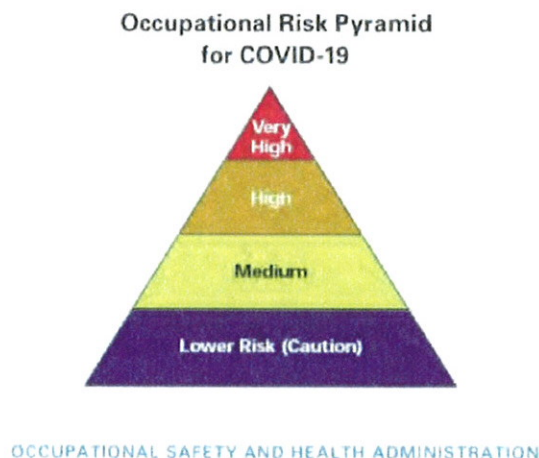
- **Medium Exposure Risk**: This category of jobs includes those not otherwise classified as very high or high exposure risk in places of employment that require more than minimal occupational contact inside six feet with other employees, other persons, or the general public who may be infected with SARS-CoV-2, but who are not known or suspected to be infected with the SARSCoV-2 virus.

- **Lower Exposure Risk (Caution)**: This category covers jobs that are not otherwise classified as very high, high, or medium exposure risk that do not require contact inside six feet with persons known to be, or suspected of being, or who may be infected with SARS-CoV-2. Employees in this category have minimal occupational contact with other employees, other persons, or the general public, such as in an office building setting; or are able to achieve minimal occupational contact through the implementation of engineering, administrative and work practice controls.

The Company has reviewed our operations and assigned all employees an exposure risk classification based on guidance from current local, state, and federal health authorities. The Company's employees have been classified as having a medium exposure risk.

Basic infection prevention controls

Basic infection prevention controls will be emphasized to protect workers during this COVID-19 pandemic. If you have a specific question about this plan, please ask your manager or supervisor.

The Company has received the following control and preventative guidance from local, state, and federal health authorities, applicable 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 mouth and nose for coughs and sneezes.

- Avoid close contact with people who are sick.

- Use tissues for coughs and sneezes and dispose of them in the trash receptacle. Do not touch the trash receptacle.

- Do not share work tools and equipment.

  Face Covering

- Face covering means an item normally made of cloth or various other materials with elastic bands or cloth ties to secure over the wearer's nose and mouth to contain or reduce the spread of potentially infectious respiratory secretions at the source.

- A face covering is not intended to protect the wearer, but it may reduce the spread of virus from the wearer to others.

- A face covering is not subject to testing and approval by a state or federal government agency, SO it is not considered a form of PPE or respiratory protection equipment under OSHA laws, rules, regulations, and standards.

- A face covering must be worn whenever 6 feet distancing cannot be achieved or maintained on worksites to include work trailers, offices, maintenance locations, storage yards, and vehicles.

Sanitation 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.

- 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.

- All common spaces, including bathrooms, frequently touched surfaces, and doors, shall at a minimum be cleaned and disinfected at the end of each shift.

- All shared tools, equipment, workspaces, and vehicles shall be cleaned and disinfected prior to transfer from one employee to another.

- The Company shall ensure that hand sanitizer dispensers are always filled.

- The Company shall ensure that cleaning and disinfecting products are readily available to employees to accomplish the required cleaning and disinfecting. In addition, employers shall ensure use of only disinfecting chemicals and products indicated in the Environmental Protection Agency (EPA) List N for use against SARS-CoV-2.

- The Company will maintain Safety Data Sheets of all disinfectants used on site.

Self-monitor

Employees are encouraged to self-monitor for symptoms of COVID-19 before arriving for work, including a temperature screening. If your temperature reads at or above 100.4 degrees twice over a period of five minutes, an employee should not report to work, but rather contact your supervisor and your local healthcare provider.

COVID-19 Addendum: Jobsite Exposure Situations

Employee Exhibits COVID-19 Symptoms

If an employee exhibits COVID-19 symptoms, the employee should report their symptoms to their supervisor, remove themselves from the jobsite to the designated isolation area or remain home, and call their healthcare provider. The employee may return to work in a manner of time consistent with CDC, state, and local guidelines.

If an employee exhibits COVID-19 symptoms, the employee must remain at home until:

1. They have received a negative test result for COVID-19; and

2. At least 24 hours have passed since the resolution of fever without the use of fever-reducing or other symptom-altering medicines (e.g., Tylenol, cough suppressants, etc.); and

3. Other symptoms have improved.

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

Employee Tests Positive for COVID-19

If an employee tests positive for COVID-19, the employee will be directed to self-quarantine away from work and should report the need to quarantine to their supervisor as soon as practicable. The employee may return to work consistent with CDC and state and local guidelines.

If the Company learns that an employee has tested positive, the Company will perform required contact tracing for the purpose of identifying and notifying co-workers that had close contact with the confirmed-positive employee, and direct those individuals to call their healthcare provider regarding the length of time to stay home. Close contact is defined by the CDC as being within 6 feet of an infected person for at least 15 minutes starting from 2 days before illness onset until the time the infected person is isolated.

Employees that test positive and never develop symptoms, must remain at home until 10 days after the date of their first positive diagnosis of COVID-19.

Employees that test positive and develop symptoms must remain at home until:

1. At least 10 days have passed since symptom onset; and

2. At least 24 hours have passed since the resolution of fever without the use of fever-reducing or other symptom-altering medicines (e.g., Tylenol, cough suppressants, etc.); and

3. Other symptoms have improved.

Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. The Company will require an employee to provide documentation clearing their return to work.

Employee Has Close Contact (Household) with a Tested Positive COVID-19 Individual

If an employee has had close contact with a confirmed-positive COVID-19 individual that lives in the same household, the employee should report this to their supervisor, remove themselves from the jobsite to the designated isolation area or remain home, and call their healthcare provider. The employee may return to work in a manner of time consistent with CDC, state, and local guidelines.

Employees that have come into close contact with a confirmed-positive COVID-19 individual that lives in the same household will be directed to:

1. Self-quarantine for 14 days from the last date of close contact with the carrier; and

2. Self-monitor for symptoms; and

3. Follow CDC and applicable state and local guidelines if symptoms develop.

If the Company learns that an employee has tested positive, the Company will perform required contact tracing for the purpose of identifying and notifying co-workers that had close contact with the confirmed-positive employee in the prior 48 hours from onset of symptoms, and direct those individuals to call their healthcare provider regarding the length of time to stay home. Close contact is defined by the CDC as being within 6 feet of an infected person for at least 15 minutes starting from 2 days before illness onset until the time the infected person is isolated.

Employee Has Close Contact (Non-Household) with a Tested Positive COVID-19 Individual

If any employee has had close contact, as defined by the CDC, with a confirmed-positive COVID-19 individual that does not live in the same household, the employee should report this to their supervisor, remove themselves from the jobsite to the designated isolation area or remain home, and call their healthcare provider. The employee may return to work in a manner consistent with CDC, state, and local guidelines.

Employees that have come into close contact, as defined by the CDC, with a confirmed-positive COVID-19 individual and are symptom-free will be allowed to continue to work as long as all of the criteria below are met every day for 14-days after last exposure to the confirmed-positive COVID-19 individual:

1. Pre-screen temperature check before starting work (must be below 100.4); and

2. Self-monitoring of symptoms; and

3. Employee that has come into close contact with a carrier must wear a face covering at all times for 14 days after last exposure; and

4. Employee must always maintain 6 feet of social distancing; and

5. Employer must ensure workspace is routinely cleaned and disinfected.

If these criteria cannot be met for 14 days after last exposure, or if the employee starts exhibiting symptoms, they are to remain at home in self-isolation.