

SHEET METAL CONNECTORS INC.
EXPOSURE PREVENTION, PREPAREDNESS AND RESPONSE PLAN

SHEET METAL CONNECTORS, INC. 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” in many locations throughout the United States 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. 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. The Company may also amend this Plan based on operational needs.

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 shop safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

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, we all must play our part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices. All employees must follow these. 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 Jeff Vetruba SMC’S Operations Manager

SHA 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 of 100.4 degrees Fahrenheit or higher;
- 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.

Guidance for Critical Infrastructure Employers

The CDC has provided guidance for employers regarding safety practices for “critical infrastructure workers” who may have been exposed to a person with a suspected or confirmed case of COVID-19. Construction has been deemed as critical infrastructure by the U.S. Department of Homeland Security’s Cybersecurity and Infrastructure Security Agency (“CISA”) and many state and local jurisdictions have similarly deemed construction as critical infrastructure during the COVID-19 pandemic. Given this, SHEET METAL CONNECTORS, INC. is adopting the following protocol for employees exposed or potentially exposed to a suspected or confirmed case of COVID-19, consistent with CDC recommendations.

If a critical infrastructure employee has been exposed or potentially exposed to a suspected or confirmed case of COVID-19, SHEET METAL CONNECTORS INC. will permit the employee to continue to work, but will implement the following practices:

- Measure temperature of employees before they enter the worksite (see Appendix A for additional information);
- Regularly monitor asymptomatic employees;
- Exposed or potentially exposed employees wear a mask/face covering for 14 days after exposure;
- Have employees maintain social distancing as work duties permit; and
- Routinely disinfect workspaces.

Depending upon workforce needs, SHEET METAL CONNECTORS, INC. may choose to keep the exposed or potentially exposed employee away from work for 14 days. *See* Section below.

Job Shop Protective Measures

The Company has instituted the following protective measures at all locations.

A. General Safety Policies and Rules

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave and return home. SHEET METAL CONNECTORS, INC. may determine that taking employee/contractor/visitor temperatures at worksites is appropriate and restrict access based upon temperature readings. As an alternative to taking temperatures at the worksite, SHEET METAL CONNECTORS, INC. may request employees/contractors/visitors to take their own temperatures prior to coming to the worksite. (See Appendix A for additional information.)
- Safety meetings will take place, if possible. If safety meetings are conducted in-person, attendance will be collected verbally and the foreman/superintendent will sign-in each attendee. Attendance will not be tracked through passed-around sign-in sheets or mobile devices. During any in-person safety meetings, gathering participants must remain at least six (6) feet apart.

D. Personal Protective Equipment and Work Practice Controls

- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide:
 - Gloves: Gloves should be worn at all times while on-site. 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. Employees should avoid sharing gloves.
 - Eye protection: Eye protection should be worn at all times while on-site.
 - **NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Employees should wear N95 respirators if required by the work and if available.
- 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 in the shops.
- To the extent that shortages of N95 respirators continue to occur and the Company has exhausted other alternatives, the Company will take the following steps in accordance with OSHA guidance to continue to protect employees where respirator use is required by other OSHA standards:
 - *Extended use or reuse of N95s* – If extended use or reuse of N95 respirators becomes necessary, the same employee is permitted to extend use of or reuse the respirator, as long as the respirator maintains its structural and functional integrity and the filter material is not physically damaged, soiled, or contaminated.

- *Use of expired N95s* – If N95s are not available and extended use or reuse of N95s is not possible, employees may use previously NIOSH-certified *expired* N95s.
- *Non-NIOSH approved respirators* – If N95s are not available, extended use or reuse of N95s is not possible, and expired N95s are not available, employees may use respirators that are either certified under certain standards of other countries; or previously certified under the standards of other countries but

beyond their manufacturer’s recommended shelf life. OSHA directs that respirators certified by the People’s Republic of China be used only after respirators from other countries are sought.

E. Face Coverings

SHEET METAL CONNECTORS, INC. has reviewed OSHA’s workplace classification scheme for worker exposure potential to COVID-19. While construction work could generally be considered “low risk” for viral transmission, some construction tasks or activities may involve working with others in proximity closer than six feet, including sitting in the same vehicle, and therefore might be considered as “medium risk” under the Agency’s risk pyramid.

Due to this and CDC recommendations for community spread prevention, we may implement a face covering policy for certain work activities for the foreseeable future, including those situations where (1) it is mandated by state or local rule, or (2) employees must work in proximity of six (6) feet from other employees. A face covering is a cloth, bandana, or other type of material that covers a person’s nose and mouth. The CDC lists five criteria for “cloth face coverings”: the face covering should:

- fit snugly but comfortably against the side of the face;
- be secured with ties or ear loops;
- include multiple layers of fabric;
- allow for breathing without restriction; and
- be able to be laundered and machine-dried without damage or change to shape.

Use of a face covering is not a substitute for other workplace preventative techniques that are outlined in this Plan. Face coverings are not considered to be a respirator (per OSHA) and therefore do not require implementation of the OSHA-required Respiratory Protection Program. However, training for proper use and limitations of face coverings will be provided.

Shop Exposure Situations

- **Employee Exhibiting COVID-19 Symptoms**

If an employee exhibits COVID-19 symptom, the employee must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). The Company will similarly require an employee that reports to work with symptoms to return home until they are symptom free for 72 hours (3 full days). 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 seven (7) days have passed since the date of his or her first positive test, and 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 seven (7) 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 will 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 either: (1) continue to work, provided they remain asymptomatic in accordance with Section III above; or, if they are symptomatic or the Company chooses to follow more conservative protocols, (2) self-quarantine for 14 days from the last date of close contact with the carrier. Close contact is defined as six (6) feet for a prolonged period of time.

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 either continue to work, provided they remain asymptomatic in accordance with Section III above, or, if they are symptomatic or the Company chooses to follow more conservative protocols, to self-quarantine for 14 days from the last date of close

¹ Recovery is defined as: (1) resolution of fever without the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

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.

OSHA Recordkeeping – Recording and Reporting

For purposes of recording cases of COVID-19 in the Company OSHA 300 log, the Company is responsible for recording a case, if:

1. The case is a tested-positive confirmed case of COVID-19, as defined by the CDC;
and
2. The case is “work-related,” which is defined as an event or exposure that either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness; **and**
3. The case involves one or more of the following:
 - Death;
 - Days away from work;
 - Restricted work or transfer to another job;
 - Medical treatment beyond first aid;
 - Loss of consciousness; and
 - A significant injury or illness diagnosed by a physician or other licensed health care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

However, per OSHA guidance, the Company will consider a COVID-19 positive case to be work-related only where:

- There is objective evidence that a COVID-19 case may be work-related. For example, a number of cases developing among workers who work closely together without an alternative explanation; and

- The evidence was reasonably available to the Company. For example, the Company was given information by employees or the Company learns of information regarding employees' health and safety in the ordinary course of business.

For purposes of reporting the case to OSHA, the Company will report any work-related confirmed cases if they result in a fatality within 8 hours or an in-patient hospitalization within 24-hours of the exposure incident occurring.

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.

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 Jeff Vetruba SMC'S Operations Manager

Appendix A – Temperature Screening Guidance

General Considerations

- Certain local jurisdictions have recommended or required employers to conduct temperature screenings of employees as they enter the worksite. Any applicable federal, state, or local requirements on employee temperature screenings should be consulted prior to performing them.
- Temperature screenings must be conducted consistently, professionally, and with proper training for those conducting the checks. Such checks must be uniformly and non-discriminatorily conducted on all employees (as well as contractors, vendors, customers, and/or visitors, if they will also be screened).
- Any information obtained from temperature screenings should be stored securely with access limited to those with a business need to know. It is essential to have proper documentation in the event that an individual needs to be excluded from the worksite based on the results of their temperature screening. If excluding individuals from a worksite based upon temperature, a set temperature should be established, based upon public health recommendations. SMC & SMP have set the temperature required for exclusion at 100.4 degrees Fahrenheit or above.
- Wage protocols and procedures to account for any potential time spent waiting in line to be screened must also be considered. This is particularly important at worksites where there may be numerous workers reporting to their shift at the same time and only one or two individuals conducting the temperature screenings. Any existing Collective Bargaining Agreements should also be considered.

Options for Screening

- There are two options for how temperature screening can be conducted:
 - By the employee, at home, prior to leaving for work; or
 - By the employer, at the worksite, when the employee arrives to report for their shift.
- Types of temperature screeners:
 - *Traditional digital thermometers applied typically in the ear.* These thermometers should only be used with a temperature screening policy that requires employees to conduct such screenings at their homes, prior to leaving for their shift. These types of thermometers should not be used by employers at

the worksite as there would be a high risk of exposure for the individuals conducting such temperature screenings.

- *Infrared thermometers.* Infrared thermometers are the most practicable and safe option for conducting screening at work. However, the individual conducting such temperature screening must still be provided with appropriate protective gear. If the infrared thermometer does not allow the individual conducting the screening to stand at least six feet from the employee being screened, the following protective gear is recommended:
 - The individual conducting the screening should wear a face covering and gloves. If at all possible, the employee being screened should wear a face covering as well during the check.
 - If the employee is not wearing a face covering, the individual conducting the screening should wear a gown and eye protection in addition to a face covering and gloves.

If the individual conducting the screening is able to stand six feet or more from the employee being screened, no additional protective gear is necessary, though a face mask and gloves are recommended.