



EST Companies LLC COVID-19 Plan

Exposure Prevention, Preparedness, and Response

EST Companies LLC 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, the Company must remain vigilant in mitigating the outbreak. The Company is a proud part of 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, to the extent feasible and appropriate, throughout the Company and at all of our jobsites. The Company has also identified a team of employees to monitor the related guidance that U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) continue to make available. This Plan is based on information available from the CDC and OSHA at the time of its development, 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 jobsite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

Responsibilities of Employees

The Company is 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, everyone must play their part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our jobsites. 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.

OSHA and the CDC have provided the following control and preventative guidance for 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.



- Wear face coverings/masks when appropriate and/or mandated
- Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19, and **not** come to work if they are exhibiting the following:

- cough
- shortness of breath or trouble breathing
- or at least two of the following: fever (greater than 100.4 degrees F or 38 degrees C, chills), repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell.

Employees must call their supervisor and healthcare provider right away. Likewise, if an employee comes into close contact with someone showing these symptoms, they must call their supervisor and healthcare provider right away.

Job Site Protective Measures

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

General Safety Policies and Rules

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.
- Safety meetings will be by telephone, if possible. Attendance will not be tracked through passed-around sign-in sheets or mobile devices. During any in-person safety meetings, avoid gathering in groups of more than 10 people and participants must remain at least six (6) feet apart.
- Employees must avoid physical contact with others and shall direct others (coworkers/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 and visitors must wear face coverings/masks as appropriate and/or mandated.
- All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone.
- Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people.
- The Company understands that due to the nature of our work, access to running water for hand washing may be impracticable. In these situations, the Company will provide, if available, alcohol-based hand sanitizers and/or wipes.
- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, the Company will provide alcohol-based sanitizer/wipes to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- Employees are encouraged to minimize ride-sharing. While in vehicles, employees must ensure adequate ventilation.
- If practicable, each employee 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 should use individual water bottles.



Workers entering Occupied Buildings (non-company)

- Maintenance/Construction activities within occupied buildings/spaces present unique hazards with regards to COVID-19 exposures. Everyone working within such should evaluate the specific hazards when determining best practices related to COVID-19.
- During this work, employees must sanitize the work areas upon arrival, throughout the workday, and immediately before departure. The Company will provide alcohol-based sanitizer or wipes for this purpose. Workers should also wash or sanitize hands immediately before starting and after completing the work.
- Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum.
- Employees should wear face coverings/masks as appropriate and/or mandated.

Personal Protective Equipment and Work Practice Controls

- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), the Company will also provide:
- Nitrile 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. Nevertheless, employees must 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 on the jobsite.

Company Facility and Job Site Cleaning/Disinfecting

The Company has instituted regular housekeeping practices, which include 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 should be cleaned by the leasing company at least twice per week 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.

- Professional cleaning services are taking place 2x weekly at all company facilities that includes cleaning and disinfecting
- Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.
- OSHA has indicated that a reliable report that an employee has tested positive for COVID-19 does not typically require an employer to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, the Company will clean those areas of the jobsite that a confirmed-positive individual may have contacted and it will do so before employees can access that work space again.

The Company will ensure that any disinfection shall be conducted using one of the following:

- Common EPA-registered household disinfectant
- Alcohol solution with at least 60% alcohol; or
- Diluted household bleach solutions (if appropriate for the surface).

Jobsite Exposure Situations

- Employee Exhibits COVID-19 Symptoms before reporting to work. The employee must call in to their immediate supervisor. The EST Employee Absence Notification Form will be completed documenting their symptoms. The EST Employee COVID-19 Protocol will be initiated. This protocol details the steps that the employee and co-workers in contact with this employee must follow. Once testing results are returned the EST Employee COVID-19 Protocol – Negative Result and/or EST Employee COVID-19 Protocol – Positive Result steps will be followed for the employee in question as well as their co-workers.
- Employee Exhibits COVID-19 Symptoms when reporting to work; they will immediately be sent home; an EST Employee Absence Notification Form completed and steps followed as above.
- EST Employee COVID-19 Protocols are updated with evolving recommendations by CDC and OSHA.
- If applicable, the Company will also notify any sub- contractors, vendors/suppliers or visitors who may have had close contact with the confirmed-positive employee.
- 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 supervisor of the close contact and the current protocols will be initiated.

OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for record ability and report ability 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 is not a confirmed diagnosis, the record ability analysis is not necessarily triggered at that time.

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, the 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.

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 that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others. The Company reserves the right to inform other employees that an unnamed co-worker 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. The Company also reserves the right to inform sub-contractors, vendors/suppliers or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

General Questions

Given the rapidly evolving nature of the COVID-19 pandemic, the Company may modify this Plan on a case by case basis; and as recommendations change. If you have any questions concerning this Plan, please contact EST Human Resources Manager at 623-535-3060.