



COVID-19 EXPOSURE PREVENTION, PREPARDNESS AND RESPONSE PLAN

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COVID-19 Exposure Prevention, Preparedness & Response Plan

Vigilant Fire Inc. (VFI) (hereinafter “*Company*”) takes the health and safety of its employees seriously and is committed to maintaining a safe and healthy work environment. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the COVID-19 virus, the Company must remain vigilant in mitigating the outbreak and exposure amongst its employees and customers that we serve. VFI plays an important part in the construction industry as the “Fire & Life Safety Systems Supplier”, offering technical services and support, which many have 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 our jobsites. VFI remains alert of the ever-changing outbreak conditions, as they relate to community spread of the virus, including testing availability and implementation of infection prevention measures. VFI continues 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.

VFI realizes that every construction project is different. What is feasible and appropriate for any one project depends on its size, location and other unique characteristics. VFI has developed a screening procedure and checklist. This checklist is completed on a daily basis by each employee prior to accessing the worksite.

This Plan is based on information available from the CDC and OSHA and is subject to change based on further information provided by the CDC, OSHA, and other public officials. This plan shall not be construed as legal advice or any other expression of the scope or nature or legal obligation for Vigilant Fire Inc. (VFI) to provide employment and a safe place of employment to its employees, particularly under the unprecedented circumstances that the COVID-19 outbreak has created. VFI is committed to assessing the hazards for which its employees may be exposed; evaluate the risk of exposure and ensuring our employees follow guidelines to prevent exposure. VFI may amend this Plan based on operational needs.

I. RESPONSIBILITIES OF MANAGERS AND SUPERVISORS

All managers and supervisors shall be trained in this industry specific COVID-19 Prevention, Preparedness and Response plan and must be ready to continually educate employees. It is always paramount that managers and supervisors set a good example by following this Plan. This involves practicing good personal hygiene and jobsite safety practices to prevent the continued spread of the virus. General social distancing guidelines should be a continuous focus of the education of its employees, including details such as discouraging hand-shaking and other contact greetings. Managers and supervisors must encourage this same behavior from all employees.

VFI 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).
- VFI will maintain Safety Data Sheets of all disinfectants used on site.

Specifically, the role of VFI's Managers and Supervisors include but are not limited to:

- Ensure the COVID-19 Exposure Action Plan is implemented and followed.
- Access to the job site and work trailer will be limited to only those necessary for the work.
- All visitors will be pre-screened to ensure they are not exhibiting symptoms.
- Temperatures are checked upon arrival.
- Employees, contractors, and visitors shall be asked to leave the jobsite and return home if they exhibit any symptoms.
- Documentation of visitors and deliveries.
- Provide hand sanitizer and maintain Safety Data Sheets (SDS) for all disinfectants used on site.
- Provide protective equipment (PPE) to any employees assigned cleaning/disinfecting tasks.
- Staggering breaks, lunch, and general staffing to maintain proper distancing.
- Mitigating risks and hazards quickly to keep the site in compliance throughout the workday.
- Monitoring the adherence to safety protocols for all individuals on site.
- Managing the flow of traffic on and off the site and verify that all who enter can meet the health standards that will be clearly posted at the entrance to the site.
- Conduct meetings and/or toolbox talks by phone if possible. If not, instruct employees to maintain 6-foot distance. The foreman/supervisor will track attendance verbally rather than having employees sign an attendance sheet.
- Offices remain closed to customers and employees (work remotely as necessary)

II. RESPONSIBILITIES OF EMPLOYEES

VFI is requiring every one of its employees to help with our prevention efforts while at work. In order to allow the continuance of construction projects across our state and to minimize the spread of COVID-19 at our jobsites, it is important that everyone plays their part. As set forth in the plan, VFI has instituted various housekeeping, social distancing, and other best practices at our jobsites. All employees must strictly follow these new rules. In addition, employees are expected to report to their managers or supervisors, preferably via telephone if possible, 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 do not hesitate to ask your manager or supervisor. 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 supervisor and healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, notify your supervisor right away.

III. COVID-19 SYMPTOMS & GUIDELINES FOR EMPLOYEES

Employees must familiarize themselves with the symptoms of COVID-19, which include:

- Coughing, fever, shortness of breath, and difficulty breathing.
- Early symptoms may include chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose. If you develop a fever and symptoms of respiratory illness, **DO NOT GO TO WORK** and call your supervisor and health-care provider immediately. Do the same thing if you come into close contact with someone showing these symptoms.

Additionally, the following guidelines are provided to employees for prevention of COVID-19:

- Become familiar with the Exposure Action Plan and follow all elements of the Plan.
- Practice good hygiene: wash hands with soap and water for at least 20 seconds. If these are not available, use alcohol-based hand rub with at least 60% alcohol. Avoid touching your face, eyes, food, etc. with unwashed hands.
- The signs and symptoms of COVID-19 and an explanation of how the disease is potentially spread, including the fact that infected people can spread the virus even if they do not have symptoms.
- 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 close contact with people who are sick.
- The importance of staying home if they are sick or exhibiting any symptoms.
- The need to self-quarantine if they have been in contact with anyone exposed to COVID-19.
- Information on appropriate social distancing and hygiene practices, including:
 - Alternatives to shaking hands with customers or other individuals.
 - Avoiding physical contact with others and maintaining a distance of at least 6 feet from customers and other individuals, whenever possible, including inside work trailers.
 - Appropriate cleaning practices (i.e., washing hands frequently with soap and water for at least 20 seconds, or, if soap and water are not immediately available, using alcohol-based hand sanitizer that contains at least 60% alcohol and rubbing hands until they are dry; sanitizing all surfaces workers will touch).
 - Follow appropriate respiratory etiquette (CDC recommendations), which includes covering coughs and sneezes (i.e., sneezing or coughing into a tissue or into the upper sleeve).
 - Avoid touching your eyes, nose, or mouth with unwashed hands.
 - The benefits of driving to work sites or parking areas individually, when possible, without passengers or carpools.
- The types, proper use, limitations, location, handling, decontamination, removal, and disposal of any PPE being used.
- The need to wear face masks covering the nose and mouth to prevent the spread of the virus.
- The need to continue using other normal control measures, including PPE, necessary to protect workers from other job hazards associated with construction activities.
- Using Environmental Protection Agency-approved cleaning chemicals from List N or that have label claims against the coronavirus for cleaning frequently touched surfaces like tools, handles, and machines.
- All policies and procedures that are applicable to the employee's duties as they relate to potential exposures to SARS-CoV-2. It is helpful to provide employees with a written copy of those standard operating procedures.
- The need to report any safety and health concerns.

IV. JOB SITE PROTECTIVE MEASURES

VFI has instituted the following protective measures for safe work practices:

A. General Safety Policies and Rules

- To the extent possible, VFI shall screen all visitors on a daily basis upon entrance for signs and symptoms of COVID-19.
- Any employee/contractor/visitor/supplier showing symptoms of COVID-19 will be asked to leave the jobsite immediately.
- All meetings conducted in-person shall be done so outside whenever possible, or in ventilated spaces, ensuring all employees are a minimum of 6 feet apart from one another. Attendance at these meetings will be collected verbally and the foreman/superintendent will sign-in each attendee. Attendance will not be tracked through shared sign-in sheets or mobile devices and no signatures whether virtual or actual will be required.
- Employees must avoid physical contact with others and shall always direct others (co-workers/contractors/visitors/suppliers) to maintain personal space of at least six (6) feet. Where work trailers are used, only necessary employees should enter the trailers and all employees should maintain social distancing while inside the trailers. A maximum occupancy ratio of five employees per 1000 square feet of work space shall be used at all times in both temporary facilities (job trailers should be limited to 2 people) and office spaces.
- All project owner/engineer or other meetings shall be conducted via online communication or via telephone.
- Implement short in-person meetings (including toolbox talks and safety meetings) and limit the number of workers in-attendance with the use of social distancing practices.
- There shall be no traveling of office management to the jobsites unless necessary.
- There shall be no travel between offices for those stationed at the home office. Use online virtual meeting platforms.
- Employees will be encouraged to continue the maintenance of the 6 feet rule and maximum gathering guidelines of 5 persons during staggered breaks and/or lunches. Employees will also be encouraged to bring lunches and any other personal needs with them to work, mitigating the need for them to leave the jobsite during the work shift.
- VFI understands that due to the nature of our work, access to running water and soap for hand washing may be impracticable. In these situations, VFI may provide alternatives, such as alcohol-based hand sanitizers and/or wipes. Where practicable and when available, jobsite may be equipped with temporary wash stations as supplied by local vendors or they may purchase and deploy company owned stations so long as they are maintained according to OSHA and other applicable standards.

JOB SITE PROTECTIVE MEASURES (CONTINUED)

- Employees should limit the use of co-worker's tools and equipment. To the extent tools must be shared, VFI will provide alcohol-based 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 limit the need for N95 respirator use, by using engineering and work practice controls to minimize exposure. The use of cloth type facial coverings will be deployed to ensure the safety of the employees.
- When practical and where projects are of larger size, VFI will divide crews/staff into two or more teams so that projects can continue working effectively if one of the divided teams is required to quarantine. VFI may also elect to divide employees into dedicated shifts, at which point employees will remain with their dedicated shifts for the remainder of the project.
- Employees are encouraged to minimize ridesharing. All employees arriving on-site will travel with no more than 2 people per vehicle. While in vehicles, employees must ensure adequate ventilation.
- If practicable, each employee should use/drive the same truck or piece of equipment every shift. If this is not practical, then the equipment and/or vehicle shall be thoroughly sanitized by the operator/driver at the completion of their shift in preparation for the next operator/driver.
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

B. Workers entering Occupied Building and Homes

- Construction and maintenance activities within occupied homes, office buildings, and other establishments, present unique hazards with regards to COVID-19 exposures. Everyone working within such establishments 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.
- Employees should ask other occupants/clients to keep a personal distance of six (6) feet at a minimum and shall not occupy interior working zones with a rate greater than 1 employee per 100 square feet. Workers should wash or sanitize hands immediately before starting and after completing the work.

C. Visiting Customer Job Sites

- All employees visiting customer jobsites will be limited to only those necessary for the work.
- Any request for meetings shall be done online or via conference call minimizing risk and exposure.
- Site deliveries will be permitted but should be properly coordinated in line with the employer's minimal contact and cleaning protocols.

JOB SITE PROTECTIVE MEASURES (CONTINUED)

D. Personal Protective Equipment and Work Practice Controls

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. The use of Cloth type facial coverings is acceptable.

- Employees shall ensure standard disposable PPE is disposed of properly and all reusable PPE is properly sanitized prior to transferring the equipment to the next user.
- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), VFI also provides:
 - **Gloves:** Gloves should always be worn where appropriate. 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 will in no case share gloves.
 - **Eye Protection:** Eye protection should always be worn while on-site.

V. JOB SITE CLEANING AND DISINFECTING

VFI has instituted regular housekeeping practices to reduce exposure levels on the jobsite, which include cleaning and disinfecting frequently used tools and equipment, and other elements of the work environment, where possible. Employees are encouraged to regularly do the same in their assigned work areas to:

- VFI will ensure that hand sanitizer dispensers are always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently. Signage educating employees of proper hygiene and sanitization shall be installed in appropriate locations.
- Keep exposure down by using engineering and work practice controls.
- Limit exposure time to the extent practicable.
- 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 and disinfected at least twice daily by our cleaning crew and by the leasing company at least twice per week and disinfected on the inside, restocked sanitizer and handles wiped and cleaned after all breaks.
- Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.
- Cleaning techniques such as using pressurized air or water sprays that may result in the generation of bioaerosols should be avoided.

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, to ensure a safe and healthy workplace, VFI 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.

VI. JOBSITE EXPOSURE SITUATIONS

⚠ Employee Exhibits COVID-19 Symptoms

If an employee exhibits COVID-19 symptoms, 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 who reports to work with symptoms to return home until he or she is 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 who 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 who test positive and are directed to care for themselves at home may return to work when:

- (1) At least 7 days have passed since recovery;
- (2) At least seven (7) days have passed since symptoms first appeared;
- (3) Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers. The Company will require an employee to provide documentation clearing his or her return to work.

⚠ Employee Has Close Contact with an Individual Who Has Tested Positive for COVID-19

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

If the Company learns that an employee has tested positive, the Company will conduct an investigation to determine co-workers who may have had close contact with the confirmed-positive employee in the prior 3 days and direct those individuals who have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with that employee. 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 manager or supervisor of the close contact and self-quarantine for 14 days from the last date of close contact with that individual.

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).

VII. 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 decided 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 recordability analysis is not necessarily triggered at that time.

If an employee has a confirmed case of COVID-19, the Company will assess 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.

VIII. CONFIDENTIALITY/PRIVACY

Except for circumstances in which VFI 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. Vigilant Fire Inc. 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.

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 contact ***Ms. Selina Tereas, Human Resources Manager (671) 482-7083.***

COVID-19 TOOLBOX TALK

What is COVID-19?

The novel coronavirus, COVID-19 is one of seven types of known human coronaviruses. COVID-19, like the MERS and SARS coronaviruses, likely evolved from a virus previously found in animals. The remaining known coronaviruses cause a significant percentage of colds in adults and children, and these are not a serious threat for otherwise healthy adults.

Patients with confirmed COVID-19 infection have reportedly had mild to severe respiratory illness with symptoms such as fever, cough, and shortness of breath.

According to the U.S. Department of Health and Human Services/Centers for Disease Control and Prevention (“CDC”), Chinese authorities identified an outbreak caused by a novel—or new—coronavirus. The virus can cause mild to severe respiratory illness. The outbreak began in Wuhan, Hubei Province, China, and has spread to a growing number of other countries—including the United States.

How is COVID-19 Spread?

COVID-19, like other viruses, can spread between people. Infected people can spread COVID-19 through their respiratory secretions, especially when they cough or sneeze. According to the CDC, spread from person-to-person is most likely among close contacts (about 6 feet). Person-to-person spread is thought to occur mainly via respiratory droplets produced when an infected person coughs or sneezes, like influenza and other respiratory pathogens. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. It is currently unclear if 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.

In assessing potential hazards, employers should consider whether their workers may encounter someone infected with COVID-19 in the course of their duties. Employers should also determine if workers could be exposed to environments (e.g., worksites) or materials (e.g., laboratory samples, waste) contaminated with the virus.

Depending on the work setting, employers may also rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus, in order to help identify exposure risks for workers and implement appropriate control measures.

There is much more to learn about the transmissibility, severity, and other features associated with COVID-19, and investigations are ongoing.

