

COVID-19 Prevention, Preparedness, and Response Plan

Original Plan: April 30, 2020

Revised Plan: September 14, 2020

Premier Construction & Design (“**Company**”) takes the health and safety of its employees very seriously. With the spread of the coronavirus or “**COVID-19**,” a respiratory disease caused by the SARS-CoV-2 virus, the Company and its Subcontractors, Contractors and Vendors (collectively, “**Contractor**”) must remain vigilant in mitigating the outbreak.

The Company is a proud part of the construction industry, which many deemed “essential” in the United States of America during this Declared National Emergency. In order to be safe and maintain operations, Company developed this COVID-19 Prevention, Preparedness, and Response Plan (“**Plan**”) to be implemented, to the extent feasible and appropriate, throughout the Company and at all of the Company’s jobsites.

The Company also identified a team of employees to monitor the related guidance that U.S. Centers 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, which is indicated by the date at the top of this page, 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 and will provide Contractor with such amended Plan.

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

The Company is asking every one of its employees and Contractor’s employees (each an “**employee**” or collectively, the “**employees**”) to help with the Company’s prevention efforts. In order to minimize the spread of COVID-19 at its jobsites, everyone must play their part. As set forth below, the Company instituted various housekeeping, social distancing, and other best practices at its jobsites. All employees and Contractors must follow these practices and protocols. 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 the Director of Construction; Zack Boisvert zack@premierconstruction.com.

OSHA and the CDC provided the following control and preventative guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and warm water for at least 20 seconds. Only 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.
- Follow appropriate respiratory etiquette.
- Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19, which include the following:

- Coughing;
- Fever;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, new loss of taste or smell, 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 supervisor and healthcare provider right away. Likewise, if you come into close contact with someone exhibiting these symptoms, call your supervisor and healthcare provider right away.

In addition, employees and contractors are expected to follow all state, federal and local laws that apply to their location of work and their residence. Such laws may include executive orders, regulations or statutes that require wearing a face mask or face covering in public locations, social distancing and/or limiting activities that violate the number of people permitted at indoor or outdoor gatherings or events.

III. Job Site Protective Measures

The Company instituted the following protective measures at all jobsites:

A. General Safety Policies and Rules

- Any employee/Contractor/visitor showing symptoms of COVID-19 will be asked to leave the jobsite and return home.
- All paperwork must be provided electronically in lieu of hard copies to the fullest extent possible.
- All employees will be screened every shift, prior to entering buildings and/or jobsites. Employees that answer “yes” to any one of the following questions will not be allowed to access the building and/or jobsite:

- Have you been confirmed positive for COVID-19 within the last 14 days?
- Do you have any one of the following not explained by a known medical or physical condition: fever (100.4 or higher), an uncontrolled cough, shortness of breath; or do you have at least two of the following not explained by a known medical or physical condition: loss of taste or smell, muscle aches (“myalgia”), sore throat, severe headache, diarrhea, vomiting, abdominal pain.
- Have you been in close contact with any persons who has been confirmed positive for COVID-19 within the last 14 days?
- Have you been diagnosed with a confirmed case of COVID-19 within the past 10 days or are you currently awaiting results from a COVID-19 test?

Please note that the specific questions may change periodically to account for changes in executive orders or guidance from other government organizations such as state health departments or the CDC.

- Supervisors for each trade are required to submit electronically to the Company, before the start of each shift, a sign-in sheet listing the name of every employee working on site for that trade. The sign-in sheet will also confirm that each employee has answered in the negative to all of the above questions.
- The Company and its contractors must actively manage schedules and resources to achieve scheduled dates, and to prevent close proximity contact between all persons onsite. The following must be considered when creating and managing schedules:
 - Schedule work activities to prevent close proximity contact *between trades*.
 - Stagger start, end, break, and delivery times to avoid lines and/or gatherings of more than 10 people, while maintaining social distancing measures.
 - All supervisors must follow scheduled dates, and consistently put in place resources and staff to achieve these dates.
 - Employees must understand their daily work schedule before the start of work.

NOTE: Close proximity contact is defined as contact within six (6) feet.

- Divide and maintain crews/staff into at least two (2) groups where possible so that projects can continue working effectively in the event that one of the divided teams are required to quarantine.
- As part of the division of crews/staff, divide employees into dedicated shifts, at which point employees will remain with their dedicated shifts for the remainder of the project. If there is a legitimate reason for an employee to change shifts, the Company will have sole discretion in approving that alteration.

- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, clean tools before and after use with an EPA approved disinfectant. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- If practicable, each employee should use/drive the same truck or piece of equipment every shift. To the extent that equipment must be shared, disinfect equipment, including all touch points, with EPA approved disinfectant before and after every shift and/or change in operator.
- Employees must avoid physical contact with others and shall direct others (co-workers/Contractors/visitors) to increase personal space to at least six (6) feet, where possible. Where work trailers are used, doors will remain locked, and only necessary employees may enter the trailers. All employees should maintain social distancing while inside trailers.
- At all jobsites and work area entrances, two visible markings will be made (tape, paint, etc.) measured at six (6) feet apart, to serve as a guide for appropriate social distancing.
- Safety meetings will be held electronically, or by telephone, 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, avoid gathering in groups of more than 10 people and participants must remain at least six (6) feet apart.
- All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone, or electronically (Zoom, Teams, etc.).
- Due to the nature of our work, access to running water for hand washing may be impracticable. In these situations, use alcohol-based hand sanitizers and/or wipes.
- Employees are encouraged to limit the need for N95 respirator use, by using engineering and work practice controls to minimize dust. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.
- Employees are encouraged to minimize ride-sharing. If no other transportation option is available, while in vehicles with multiple passengers, employees must ensure use of face covering and adequate ventilation.
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

B. Working In Occupied Buildings

- Construction and maintenance activities within occupied office buildings, and other establishments, present unique hazards with regards to COVID-19 exposures. Everyone working within such establishments should follow posted building guidelines, and evaluate the specific hazards of their work tasks when determining best practices related to COVID-19.
- During this work, employees must sanitize work areas upon arrival, throughout the workday, and immediately before departure.
- Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum. Workers should wash or sanitize hands immediately after using the restroom, smoking, eating, drinking, and before and after work activities.
- Occupancy of elevators should be no more than one passenger for 12 square feet of floor space. All passengers must wear face masks while in elevators at all times.

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 or additional questions as may be asked in the screening, he/she should not be permitted to access the jobsite:
 - Have you been confirmed positive for COVID-19 within the last 14 days?
 - Do you have any one of the following not explained by a known medical or physical condition: fever (100.4 or higher), an uncontrolled cough, shortness of breath; or do you have at least two of the following not explained by a known medical or physical condition: loss of taste or smell, muscle aches (“myalgia”), sore throat, severe headache, diarrhea, vomiting, abdominal pain.
 - Have you been in close contact with any persons who has been confirmed positive for COVID-19 within the last 14 days?
 - Have you been diagnosed with a confirmed case of COVID-19 within the past 10 days or are you currently awaiting results from a COVID-19 test?
- Site deliveries will be permitted but should be properly coordinated in line with minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if at all possible.

D. Personal Protective Equipment and Work Practice Controls

- In addition to regular PPE for various tasks (fall protection, hard hats, hearing protection. Etc.), the following is required:
 - Gloves: Gloves must 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.
 - Face masks such as surgical masks, cloth masks, or masks otherwise consistent with the CDC's recommendations, must be worn by all employees while indoors, unless their use creates a separate safety hazard.
 - Eye protection: Eye protection must 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.
- A rigorous housekeeping program shall be maintained to reduce dust levels on the jobsite.

IV. Job Site Cleaning and Disinfecting

The Company has instituted regular housekeeping practices which include cleaning and disinfecting elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas including:

- Jobsite trailers and break/lunchroom areas at least once per day.
- All common touch points including door handles, faucet handles, stair rails, grab bars and toilet seats.
- Collect trash from the jobsite frequently wearing nitrile, latex, or vinyl gloves.

- Vehicles and equipment/tools should be cleaned both before and after change in operator or rider.

Any portable jobsite toilets should be cleaned by the leasing company at least twice per week and disinfected on the inside, while also ensuring that hand sanitizer dispensers are always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently.

OSHA has indicated 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.

- Disinfection shall be conducted using one of the following:
 - Common EPA-registered disinfectant;
 - Alcohol solution with at least 60% alcohol; or
 - Diluted household bleach solutions (if appropriate for the surface).
- The Company will maintain Safety Data Sheets of all disinfectants used on site.

V. Jobsite Exposure Situations

A. 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 24 hours (1 full day) 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 24 hours (1 full day).
- Moreover, Employees are required to follow the direction of their healthcare provider, and local health department, and obtain clearance from their healthcare provider clearing them to return to work.

B. Employee Tests Positive for COVID-19

- If an employee tests positive for COVID-19, the employee's supervisor shall immediately notify the Company's project manager and director of construction who will then:

- Immediately stop work where the employee was working, and prevent others from entering the area until disinfected.
 - Contact the health department.
 - Prepare incident report.
 - Notify principles of other trades.
 - Identify and inform potentially-impacted employees working in close proximity.
 - Identify and inform employees working on-site, but not in close proximity.
 - Throughout this process, the confidentiality of the employee must be maintained.
- 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:
 - At least 24 hours (1 full day) have passed since recovery*; and
 - At least seven (7) days have passed since symptoms first appeared.
 - Moreover, Employees are required to follow the direction of their healthcare provider, and local health department, and obtain clearance from their healthcare provider clearing them to return to work.

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

- A. Employees who have either come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise), or has been diagnosed with COVID-19, or obtains a COVID-19 test for any reason, or attends a mass gathering or super spreader event.
- will be directed to self-quarantine for 14 days from the last date of close contact with that individual. Close contact is defined as contact within six (6) feet for a prolonged period of time.
 - Moreover, Employees are required to follow the direction of their healthcare provider, and local health department.

*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).

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 determined 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 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 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.

VII. 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 Contractors, 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.

VIII. 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 the Director of Construction, Zack Boisvert zack@premierconstruction.com