

## 761 – COVID-19 WORKPLACE RESPONSE PLAN

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### NEWKIRK ELECTRIC ASSOCIATES, INC.

#### COVID-19 Workplace Response Plan

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### 761.1 PURPOSE

- A. The purpose of this Plan is to reduce the risk of exposure to COVID-19 in the Company's work locations. The Plan describes how to prevent worker exposure to coronavirus, protective measures to be taken on the jobsite, personal protective equipment and work practice controls to be used, cleaning and disinfecting procedures, and what to do if a worker becomes ill.

### 761.2 SCOPE

- A. Newkirk Electric Associates 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. In order to be safe and maintain operations, we have developed this COVID-19 Workplace Response Plan to be implemented throughout the Company and on all our jobsites. 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.
- B. 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.
- C. Specific questions about this Plan or COVID-19 should be directed to the immediate manager or supervisor. If they cannot answer the question, the employee should contact the Human Resources Manager.

### 761.3 RESPONSIBILITIES

- A. Managers and Supervisors
  - (1) All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees.
  - (2) Managers and supervisors must always set a good example by following this Plan. 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.
  - (3) Managers and Supervisors are expected to report any COVID-19 cases or potential cases to the Human Resources Manager immediately.
- B. Employees
  - (1) Employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below.
    - (a) Coughing
    - (b) Fever greater than 100.4
    - (c) Shortness of breath, difficulty breathing
    - (d) Early symptoms such as chills, body aches, sore throat, headache, nausea/vomiting, and runny nose
  - (2) If an employee develops a fever and symptoms of respiratory illness, such as cough or shortness of breath, they should NOT REPORT TO WORK and contact his/her healthcare provider.
    - (a) If an employee should come into close contact with someone exhibiting these symptoms, they should contact his/her healthcare provider.

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- (3) Employees will practice the following control and preventative measures regardless of exposure risk:
  - (a) Frequently wash 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.
  - (b) Avoid touching eyes, nose, or mouth with unwashed hands.
  - (c) Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
  - (d) Avoid close contact with people who are sick.

### 761.4 JOBSITE PROTECTIVE MEASURES

#### A. General Safety Policies and Rules

- (1) Designate an individual as the COVID-19 supervisor(s) who shall always be present on the jobsite and must enforce the precautionary measures contained in this Plan.
- (2) Employees who have CDC-recognized symptoms of COVID-19 shall notify their supervisor and stay home. Any employee showing symptoms of COVID-19 on site will be immediately isolated and required to leave the jobsite to be quarantined and to seek proper medical treatment.
- (3) Safety Stand-Downs/Toolbox Talks will be required on all job sites and must detail the protective measures in place for all workers. A minimum of six (6) feet of separation must be maintained between all employees at these meetings. Employees must be provided copies of the SF-202 Work Plan, SF-203 Fit for Duty Questionnaire, and the SF-204 Case Risk Assessment (for Managers), and COVID-19 Prevention and Work Practice Controls upon return to work.
- (4) The Company will create a dedicated entry point at every worksite, if possible, for daily screening as called for in this plan.
  - (a) Employees who start their workday from home or a remote location, and do not have availability to a formal screening by others, must self-evaluate and record their individual status of form SF-203 Fit for Duty Questionnaire. Complete form must be made available if a customer or facility requests verification of the employee's pre-work screening.
- (5) The Company will maintain a daily attendance log of all employees on jobsites in a manner which enables rapid contact tracing between employees in the event an employee on a jobsite tests positive for COVID-19.
  - (a) Attendance will be collected verbally, and the foreman/superintendent will sign in each employee.
  - (b) During attendance, employees will be screened for COVID-19 symptoms by self-identifying symptoms such as cough, fever, shortness of breath, or other symptoms listed elsewhere in this document.
  - (c) Employees may be required to submit to additional or enhanced screenings as customer facilities mandate. Customer specific screening such as non-contact body temperature measurements, will be administered by Newkirk management or customer designated personnel who have been trained.
- (6) Employees must avoid physical contact with others and direct employees/contractors/visitors to increase personal space to at least six (6) feet, where possible.
  - (a) Where work trailers are used, only necessary employees should enter the trailers and all employees should maintain social distancing while inside the trailers.

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- (7) Employees will be prohibited from congregating during scheduled break times. A minimum of six (6) feet of separation must be maintained amongst all employees during breaks.
  - (8) The Company will identify choke points and high-risk areas where workers must stand near one another (such as hallways, hoists and elevators, break areas, water stations, and buses) and control their access and use so that social distancing is maintained.
  - (9) The Company will provide soap and running water on all jobsites for frequent handwashing. In the event running water is not obtainable on a jobsite, the Company will provide alcohol-based hand sanitizers with a minimum of 60% ethanol or 70% isopropanol.
  - (10) Employees should limit the use of coworkers' tools and equipment. To the extent tools must be shared, the Company will provide cleaning/sanitation products to clean tools before and after use.
    - (a) When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
    - (b) If practicable, an employee should use/drive the same truck or piece of equipment every shift.
  - (11) Vehicle Usage
    - (a) Vehicle occupancy should be reduced as low as practicable to increase physical distancing inside the vehicle.
    - (b) If more than one employee is to share or ride in a vehicle with another Newkirk employee, customer, or facility personnel, face-coverings and other appropriate PPE must be worn by all occupants of the vehicle.
    - (c) Eating, smoking, and drinking within a shared vehicle is prohibited.
    - (d) Employees will be notified of shared vehicle requirements if required to share a vehicle.
    - (e) Customer, facility or project requirements dictating specific vehicle occupancy will be addressed with the individual customer.
  - (12) In lieu of using a common source of drinking water, such as a cooler, employees must use individual water bottles.
- B. Workers entering Occupied Buildings**
- (1) When employees perform construction and maintenance activities within occupied office buildings, and other establishments, these work locations present unique hazards with regards to COVID-19 exposures. All such workers should evaluate the specific hazards when determining best practices related to COVID-19.
  - (2) During this work, employees must sanitize the work areas upon arrival, throughout the workday, and immediately before departure. The Company will provide cleaning/sanitation products for this process.
  - (3) Employees should ask other occupants to keep a personal distance of six (6) feet at a minimum. Workers should wash or sanitize hands immediately before starting and after completing the work.
  - (4) Masks should be worn when workers cannot consistently maintain six (6) feet of separation from other individuals in the workplace.
- C. Jobsite Visitors**

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- (1) The number of visitors to the job site, including the trailer or office, will be limited to only those necessary for the work.
  - (2) All visitors will be screened in advance of arriving on the job site. If the visitor answers “yes” to any items on SF-203 (below) or any of the following questions, he/she should not be permitted to access the jobsite:
    - (a) Do you have any of the symptoms associated with COVID-19 absent of another cause known or a pre-existing condition?
      - (i) Fever or chills
      - (ii) Cough
      - (iii) Shortness of breath or difficulty breathing
      - (iv) Fatigue
      - (v) Muscle or body aches
      - (vi) Headache
      - (vii) New loss of taste or smell
      - (viii) Sore throat
      - (ix) Congestion or runny nose
      - (x) Nausea or vomiting
      - (xi) Diarrhea
    - (b) Have you had close contact with (close contact is defined as within six (6) feet for at least 15 minutes within 24 hours starting from 2 days before illness onset) or cared for someone diagnosed with COVID-19 in the last 14 days?
    - (c) Have you been diagnosed with COVID-19 in the last 10 days, or are you awaiting results of a COVID-19 test?
  - (3) Site deliveries will be permitted but should be properly coordinated in line with the employer’s minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if possible and a minimum of six (6) feet of separation must be maintained between employees and delivery personnel.
- D. Personal Protective Equipment and Work Practice Controls**
- (1) In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), the Company will also provide masks, gloves, and eye protection.
  - (2) Masks: The Company will provide, non-medical grade face coverings. These items must be worn when workers cannot consistently maintain a minimum of six (6) feet of separation.
    - (a) Masks will be issued to employees in appropriate quantities prior to employees accessing work sites.
    - (b) The CDC currently does not recommend that healthy people wear N95 respirators to prevent the spread of COVID-19.
  - (3) Gloves: Glove use will be task dependent. The type of glove worn should be appropriate to the task.
    - (a) Based on WHO and CDC findings, Newkirk Electric does not require or recommend employees wear nitrile gloves or approved equivalent.
  - (4) Eye protection: Regardless of COVID, eye protection must always be worn while on site.
  - (5) Work Practice Controls due to the shortage of N95 respirators should be followed.

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- (a) Keep dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.
- (b) Limit exposure time to the extent practicable.
- (c) 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.
- (d) Institute a rigorous housekeeping program to reduce dust levels on the jobsite.

### 761.5 JOBSITE CLEANING AND DISINFECTING

- A. The Company will require regular housekeeping practices, including 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.
- B. Jobsite trailers and break/lunchroom areas should be cleaned at least once per day. Employees performing cleaning will be issued proper personal protective equipment (“PPE”) as recommended by the CDC.
- C. Any trash collected from the jobsite should be changed frequently. Dispose of soiled PPE in labeled containers.
- D. Any portable jobsite toilets provided by the Company should be cleaned regularly during the workweek and disinfected on the inside. Hand sanitizer dispensers should be maintained and filled regularly. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently.
- E. Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.
- F. If an employee has tested positive for COVID-19, the Company will clean and disinfect those areas of the jobsite that a confirmed-positive individual may have come into contact with before employees can access that workspace again. The Company will also notify contractors or owners of any confirmed COVID-19 cases among its workers.
- G. The Company will ensure that any disinfection shall be conducted using one of the following:
  - (1) Common EPA List N household disinfectant;
  - (2) Alcohol solution with at least 60% alcohol; or
  - (3) Diluted household bleach solutions (these can be used if appropriate for the surface).

### 761.6 JOBSITE EXPOSURE SITUATIONS

- A. Employee Exhibiting COVID-19 Symptoms
  - (1) Employees who exhibit COVID-19 symptoms and were directed to care for themselves at home may discontinue isolation under the following conditions:
    - (a) Resolution of a fever without the use of fever-reducing medications; **and**
    - (b) At least ten (10) days have passed since symptom onset; **and**
    - (c) Improvement in other symptoms (i.e. cough, shortness of breath, etc.)
  - (2) To the extent practical, employees are required to obtain a doctor’s note clearing them to return to work.
- B. Employee Tests Positive for COVID-19
  - (1) An employee that tests positive for COVID-19 will be directed to self-quarantine away from work.

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- (2) Employees that test positive and are *symptom free* may return to work when:
  - (a) At least ten (10) days have passed since the date of his or her first positive test, and they have not had a subsequent illness.
- (3) Employees that test positive *with symptoms* and are directed to care for themselves at home may return to work when:
  - (a) At least 24 hours have passed since resolution of fever without the use of fever-reducing medications;
  - (b) At least ten (10) days have passed since symptoms first appeared; **and**
  - (c) Any other symptoms have improved.
- (4) Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider.
  - (a) For employees with severe illness, duration of isolation for up to 20 days after symptom onset may be warranted.
- (5) The Company may require an employee to provide documentation clearing their return to work.

### C. Employee Has Close Contact with a Tested Positive COVID-19 Individual

- (1) Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be directed to self-quarantine for 14 days from the last date of close contact with the carrier.
  - (a) Close contact is defined as within six (6) feet for at least 15 minutes starting from 2 days before illness onset.
  - (b) On December 4<sup>th</sup>, 2020, Newkirk Electric adopted updated CDC guidance that allows individuals to reduce the length of quarantines from 14 days to 10 days. Per the guidance, an individual may end their quarantine **10 days** after the date of their last exposure if both of the following occur:
    - (i) The individual does not develop any symptoms or clinical evidence of COVID-19 infection during daily symptom monitoring for the 10 days after the last COVID-19 exposure; **AND**
    - (ii) Daily symptom monitoring continues through day 14 after the person's last exposure.
- (2) If the Company learns that an employee has tested positive, the Company will conduct an investigation into co-workers, or customers at facilities that may have had close contact with the confirmed-positive employee in the prior 2 days and direct those individuals that have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with the carrier.
- (3) Customer/Facility owners will be notified of any Newkirk employee that has worked in their facility within the previous 14 days of the employee being confirmed positive for Covid-19.
- (4) 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 the carrier.

### 761.7 RECORDKEEPING

- A. 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. If the confirmed case meets

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recordability and reportability criteria, it will be properly documented on the OSHA 300 Log and as well as documented on an OSHA Form 301.

(1) 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) A fatality within 30 days or

(b) An in-patient hospitalization within 24-hours of the exposure incident occurring.

(i) In-Patient hospitalization is defined as a formal admission to the in-patient service of a hospital for care or treatment.

**B.** 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.

(1) 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.

**C.** The Company's assessment will consider the work environment itself, the type of work performed, risk of person-to-person transmission given the work environment, and other factors such as community spread.

**D.** When an employee is identified with a confirmed case of COVID-19, the Company shall do both of the following within 24 hours:

(1) Notify the local health department

(2) Notify any co-workers, contractors, or suppliers who may have come in contact with the person with a confirmed case of COVID-19

**E.** The Company will maintain records of the following documents for one (1) year from date of generation:

(1) Training for all employees

(2) Records of screening for each employee or visitor entering the workplace.

(3) Records of required notifications provided to those as required by 761.7 (D).

### **761.8 EXPOSURE RISK DETERMINATION**

**A.** The Company has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to SARS-CoV-2.

**B.** The Company has determined employees' jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19.

(1) Lower Exposure Risk Jobs – These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six (6) feet) with the general public.

Workers in this category have **minimal** occupational contact with the public and other co-workers. Examples include:

(a) Small offices

(b) Small manufacturing plants (less than 10 employees)



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- (c) Small construction operations (less than 10 employees)
- (d) Low volume retail establishments
- (2) Medium Exposure Risk Jobs – These jobs are those that require frequent or close contact (within six (6) feet) with people who may be infect with SARS-CoV-2, but who are not know or suspected COVID-19 patients. Examples include:
  - (a) Manufacturing plants
  - (b) Construction sites
  - (c) Schools
  - (d) High-volume retail settings
  - (e) Other high-population-density work environments
- C. The Company verifies there are no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected COVID-19.
- D. The Company has categorized its jobs as follows:
- E. The company prohibits in person work for employees to the extent that their work activities can feasibly be completed remotely, and doesn't expose the employee to a greater risk of exposure to Covid-19.

<b>Job/Task</b>	<b>Exposure Risk Determination (Lower or Medium)</b>	<b>Qualifying Factors (Ex. No Public Contact, Public Contact)</b>
Office/Warehouse/Garage employees	Lower	Separated work areas, no close contact required. Face covers required if working within 6 feet.
Drivers/Delivery employees	Lower	Face covers required if sharing vehicles, or when interacting with other employers. Face covers required if working within 6 feet.
Linemen, Substation, Tower, Drilling employees	Lower	Outdoor work areas, no public contact. Face covers required if working within 6 feet.
Inside Electricians, VD, Testing Technicians, Engineering employees at long term sites	Lower	Face covers required if working within 6 feet. Schedule/ design/ work to increase social distance.

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Telecommute employees	Lower	No public contact, minimize close contact with non-household members. Face covers required if working within 6 feet.
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### 761.9 CONFIDENTIALITY/PRIVACY

- A. 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.
- B. 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.
- C. The Company reserves the right to inform other employees that a 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.