



COVID-19 PREPAREDNESS AND RESPONSE PLAN

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https://www.michigan.gov/documents/leo/MIOSHA_COVID_Emergency_Rules_726100_7.pdf

COVID-19 PREPAREDNESS AND RESPONSE PLAN

Great Lakes Stainless (GLS) takes the health and safety of our employees seriously. We are all living through the spread of COVID-19 and the need for certain employees to continue in-person work. Others either are or will soon be welcomed back into work, either because they are critical infrastructure workers, because they are needed to conduct minimum basic operations for our business or because our business is once again allowed to open. We want you to know that we are committed to reducing the risk of exposure to COVID-19 and we are ready to provide a healthy and safe workplace for our employees, customers and guests.

Our plan is based on information and guidance from the Centers for Disease Control (CDC) and the Occupational Health and Safety Administration (OSHA) at the time of its development. Because the COVID-19 situation is frequently changing, the need for modifications may occur based on further guidance provided by the CDC, OSHA, and other public officials at the state or local levels. GLS is focused on three lines of defense:

1. Daily single-point self-screening
2. Sanitizing per cdc guidelines
3. Requiring non-vaccinated employees and all undocumented guests wear a mask when less than 6' distance cannot be maintained.

Note: GLS may amend this Plan based on changing requirements and the need of our business.

The spread of COVID-19 in the workplace can come from several sources:

- Co-workers
- Customers
- Guests - visitors/vendors/family members
- The General Public

Our employees fall into one or more of the following categories as defined by OSHA:

- Lower exposure risk (the work performed does not require direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public).
- Medium exposure risk (the work performed requires frequent and/or close contact with people who may be infected with COVID-19, but who are not known COVID-19 patients, or contact with the general public in areas where there is ongoing community transmission).

COVID-19 WORKPLACE COORDINATORS (TASK FORCE)

GLS has designated the following staff as its COVID-19 Workplace Coordinators: *Melanie Berden, HR, 231-357-0550, Michael DeBruyn, President, 231-645-1783*

The Coordinators responsibilities include:

- staying up to date on federal, state and local guidance
- incorporating those recommendations into our workplace
- training our workforce on control practices, proper use of personal protective equipment, the steps employees must take to notify our business of any COVID-19 symptoms or suspected cases of COVID-19.
- reviewing HR policies and practices to ensure they are consistent with this Plan and existing local, state and federal requirements

RESPONSIBILITIES OF GLS'S SUPERVISORS AND MANAGERS

All **GLS** managers/supervisors must be familiar with this Plan and be ready to answer questions from employees. Additionally, **GLS** expects that all managers/supervisors will set a good example by following this Plan. This includes 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.

GLS will require and keep a record of all self-screening protocols for all employees or contractors entering the worksite, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed cases of COVID -19.

GLS will adhere to the following for all non-vaccinated employees and visitors:

- Keep all employees on the worksite premises at least six feet from one another to the maximum extent possible, including through the use of ground markings, signs, and physical barriers, as appropriate to the worksite.
- Provide non-medical grade face coverings to their employees.
- Require face coverings to be worn when employees cannot consistently maintain six feet of separation from other individuals in the workplace, and consider face shields when employees cannot consistently maintain three feet of separation from other individuals in the workplace.
- Provide facility cleaning and disinfection per CDC guidance.
- Adopt protocols to clean and disinfect the facility in the event of a positive COVID-19 case in the workplace.
- Make cleaning supplies available to employees upon entry and at the worksite and provide time for employees to wash hands frequently or to use hand sanitizer.

- When an employee is identified with a confirmed case of COVID-19, within 24 hours, notify both:
 1. Any co-workers, contractors, or suppliers who may have come into contact with the person with a confirmed case of COVID-19.
- Increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (e.g., door handles), paying special attention to parts, products, and shared equipment (e.g., tools, machinery, vehicles).
- Adopt protocols to clean and disinfect the facility in the event of a positive COVID-19 case in the workplace.
- Conduct a daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.
- Train employees on how to report unsafe work conditions.

RESPONSIBILITIES OF EMPLOYEES

We are asking each of our employees to help with our prevention efforts while at work. **GLS**, understands that in order to minimize the impact of COVID-19 at our facility, everyone needs to play his or her part. We have instituted several best practices to minimize exposure to COVID-19 and prevent its spread in the workplace. This includes specific cleaning efforts and social distancing. While here at work, all employees must follow these best practices for them to be effective. Beyond these best practices, we require employees to report to their managers or supervisors immediately if they are experiencing signs or symptoms of COVID-19, as described below. If employees have specific questions about this Plan or COVID-19, they should ask their manager, supervisor or contact **Human Resources**.

OSHA and the CDC Prevention Guidelines

OSHA and the CDC have provided the following preventive 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.
- Avoid close contact with anyone who is sick.
- Maintain appropriate social distance of six feet to the greatest extent possible.

Additionally, employees must familiarize themselves with the symptoms and exposure risks of COVID-19. The primary symptoms of COVID-19 include the following:

- Dry cough;
- Loss of taste and smell
- Fever
- Shortness of breath or difficulty breathing

Or at least two of these symptoms:

- Fever (either feeling feverish or a temperature of 100.4 degrees or higher);
- Chills
- Repeated shaking with chills
- Muscle pain
- Headache
- Sore throat
- New loss of taste or smell

Individuals with COVID-19 may also have early symptoms such as, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as an atypical cough or shortness of breath, do not report to work. You must also notify your supervisor immediately, and consult their

healthcare provider. Similarly, if employees come into close contact with someone showing these symptoms, they must notify their supervisor immediately and consult their healthcare provider. We have the responsibility to work to identify and notify all employees who have close contact with individuals with COVID-19 symptoms. “Close contact” is not brief or incidental contact with a person with COVID-19 symptoms.

The CDC defines “close contact” as either:

- Being within roughly six feet of a COVID-19 infected person or a person with any symptom(s) for a total accumulative time of 15minutes over 24 hour period.

HEALTH AND SAFETY PREVENTATIVE MEASURES FOR GLS

GLS has put a number of best practices and measures in place to ensure the health and safety of identified groups of individuals. With each group of individuals, our Plan is focused on three lines of defense – limiting the number of people together at a time, sanitizing all areas and requiring appropriate personal protection equipment.

Minimizing exposure from co-workers.

GLS takes the following steps to minimize exposure from co-workers to COVID-19 by educating employees on protective behaviors that reduce the spread of COVID-19 and provide employees with the necessary tools for these protective behaviors, including:

General Education:

- Posting CDC information, including recommendations on risk factors
- Providing tissues and no-touch trash bins to minimize exposure to infectious secretions
- Informing employees of the importance of good hand hygiene. Regularly washing hands with soap and water for at least 20 seconds is one of the most effective ways for employees to minimize exposure to COVID-19. If soap and water are not readily available, employees should use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water should be chosen over hand sanitizer.
- Encourage good hand hygiene by ensuring that adequate supplies of soap and hand sanitizer are maintained and placing hand sanitizers in multiple locations.
- Discourage handshaking and encourage the use of other non-contact methods of greeting
- When possible, avoid the use of other employees’ phones, desks, offices, other work tools and equipment, and other commonly touched surfaces.
- If the above cannot be avoided, clean and disinfect them before and after use

Social Distancing

- Limit in-person non-vaccinated meetings
- Restrict the number of non-vaccinated workers present on-site to no more than necessary
- Encourage and require social distancing to the greatest extent possible while in the workplace
- Encourage employees to minimize ridesharing. If this cannot be avoided, while in vehicles, employees must ensure adequate ventilation
- Consider use of masks and gloves

- Do not share food utensils and food with other employees
- In areas where employees work within 6 feet of each other, computer stations should be moved or repositioned to increase distance
- Deliver items through curbside pick-up or delivery

Checklist for Employers when employee tests positive for COVID-19

- Treat positive test results and “suspected but unconfirmed” cases of COVID-19 the same.
- If the source of infection is known, identify if it was at the workplace or outside.
- If the infection was contracted inside the workplace, notify workers’ compensation carrier;
 - Place the employee on workers’ compensation leave (with pay if available); and
 - Record the infection in the employer’s OSHA 300 log.
- Consider and then include employee benefit plans that may be available including: FMLA, PTP, paid sick leave, etc.
- Ask employee if he or she grants the employer permission to disclose the fact that the employee is infected.
 - If yes:
 - Notify employee’s manager(s) or supervisor(s) that employee is infected with COVID-19 and is out on leave.
 - For everyone else, respond to inquiries by disclosing employee is on a leave of absence for non-disciplinary purposes.
 - If no:
 - Notify employee’s manager(s) or supervisor(s) only that employee is on a leave of absence for non-disciplinary purposes.
 - Regardless of yes or no:
 - Disclose identity of employee to any required notification to OSHA or the health department.
- Notify employee’s co-workers who may have come into contact with employee at work within the past 14 days that they may have been exposed to COVID-19 and may wish to see a healthcare provider.
 - Not required to notify other office locations unless the employee visited those sites within past 14 days.
- DO NOT identify the infected employee by name and to the greatest extent possible, avoid making any direct or indirect references that would lead co-workers to identity of the employee.
- For employees who had close contact with employee in past 14 days, send them home for a 14-day self-quarantine, unless the exposed employee has record of complete vaccination at the time of exposure.
- Notify known customers, vendors, or third parties with whom the employee may have come into contact with while at work within the past 14 days that they may have been exposed to COVID-19 and may wish to see a healthcare provider. DO NOT identify the infected employee by name.

- To the extent reasonably possible, avoid making any direct or indirect references that would lead the person to guess the identity of the employee.
- Currently, there is no guidance on how far a company should investigate for third parties who may have come into contact with an employee through work. It is safe to include any parties on the employee's work calendar, in visitor logs, or otherwise readily available or known.
- Arrange for a professional cleaning of the employee's workspace, immediate surrounding area, and areas likely visited (break room, restroom, etc.).
- Respond to inquiries by CDC or public health authorities as received.

Restrict employees from the workplace if they display symptoms of COVID-19

- For employees who are completing in-person work, health assessments (temperature checks) and/or questionnaires prior to entry into the facility. Check with your local county health department.
- Any employee with COVID-19 symptoms will be immediately separated from other individuals and sent home.
- The ability to work remotely will be encouraged where possible.
- Guidance from the employee's health care provider on their return to work date will be required.

Actively encourage sick employees to stay home:

- Include a statement regarding your PTO program, Families First Coronavirus Response Act Policies and Posters should be posted in common places as well as on the employee shared IT drives (if employees have questions regarding use of emergency paid sick time, employees should contact Melanie Berden)
- **GLS** will follow state and federal guidance for return to work guidance.
- Guidance from the employee's health care provider will also be considered

If an employee has a confirmed case of COVID-19, GLS ensures the following:

- We will communication with co-workers
- We will work with our local health department to provide them with the name of any identified employees that may have been exposed
- We will report cases to OSHA via their reporting/recordkeeping requirements
- **GLS** will follow CDC and State guideline protocols for return to work, including workplace contact tracing and CDC-recommended cleaning and disinfecting in all affected areas
- Guidance from the employee's health care provider will also be considered
- We will perform increased environmental cleaning and disinfection
 - Employees should sanitize their work areas upon arrival, throughout the workday, and immediately before leaving for the day
 - We will all routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.

- After using a **GLS** vehicle, employees are responsible for cleaning and disinfecting the vehicle.
- **GLS** provides disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, copiers, desks, other work tools and equipment) can be wiped down by employees before each use.
- Eliminate/restrict work-related travel if possible and limit employees' exposure to employee who traveled until we can confirm traveling employee does not have COVID-19 symptoms
- Employees at a higher risk for serious illness due to COVID-19 will be encouraged to work remotely. If working remotely is not possible, additional precautions will be put in place to ensure their safety, including working in separate workspaces.
- Monitor and respond to absenteeism

Other considerations: **Include any that apply**

- If you have additional Employee services you can include here such as - Employees are reminded about our employee assistance program (EAP) resources and community resources as needed. Contact Melanie or Amy for contact information on the following
 - EAP hotline
 - mental health services that may be available through the employer's health plan
 - County Health Department
 - Health Insurance telehealth

Minimizing exposure from those outside of our workforce including customers, and temporary or contract labor we will assume all are non-vaccinated unless valid proof is on record

- **GLS** business practices are evaluated to ensure safety and health of all individuals. This is done on a phased approach. Beginning with appointment only onsite meetings, virtual meetings and finally transitioning to onsite meetings with appropriate precautions when that time comes.
- **Social distancing practices to be observed:**
 - 6-foot distances are marked in areas where customers might gather/wait
 - In person meetings are to be made by appointments only
 - Limit the number of customers allowed into workplace
 - Minimize face to face contact
- Information is posted throughout the worksite educating individuals on ways to reduce the spread of COVID-19
- Any individual entering one of **GLS** facilities may have their temperature checked and/or a questionnaire completed prior to entry.
- Individual symptoms will be observed and individuals displaying symptoms of COVID -19 will be removed from the workplace.
- **GLS** will provide masks to customers as well as appropriate disinfectants so that individuals can clean work areas before and after use.
- Companies that provide contract or temporary employees have been contacted about the importance of sick employees staying home and we encourage them to follow our practices and standards to work with their employees to maintain the health & safety of others.

Minimizing exposure from the visitors/vendors

- All business partners that work within **GLS** have been provided this Plan
- When possible, **GLS** will limit the number of visitors in the facility.
- Possible statement about protection: Masks may be available to visitors/vendors as well as appropriate disinfectants so individuals can clean work areas before and after use.
- Possible statement about protection - Most deliveries will be handled through curbside pick-up or delivery