

TRIANGLE ASSOCIATES

COVID-19 PREPAREDNESS AND RESPONSE PLAN

MAY 4, 2020

Triangle Associates and its subsidiaries takes the health and safety of our employees extremely seriously. With the spread of COVID-19 and the need for certain employees to continue in-person work, either because they are critical infrastructure workers or they are needed to conduct minimum basic operations for Triangle Associates, we are committed to reducing the risk of exposure to COVID-19 on the job and to promoting healthy and safe workplace practices for all employees.

This Plan is based on information and guidance 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. We are following the experts.





SECTION 1 - 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.

IF A TRADE PARTNER HAS AN EMPLOYEE GO HOME OR NOT REPORT BACK TO WORK AND EXPRESSES COVID-19 SYMPTONS THEY MUST NOTIFY TRIANGLE IMMEDIATELY.

SECTION 2 - RESPONSIBILITIES OF EMPLOYEES

We are 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, we all must play our part. As set forth below, Triangle Associates 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. If they cannot answer the question, please contact Jim Conner COO/EVP at (616) 540-9071.

OSHA and the CDC have provided the following control and preventative guidance to 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 people who are sick.

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

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



SECTION 3 - JOB SITE PROTECTIVE MEASURES

Triangle Associates has 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.
- > Meetings shall be conducted by telephone or virtual meeting. If it is unpractical to conduct a virtual meeting based upon subject content, avoid gathering in groups of more than 10 people. Participants must remain at least six (6) feet apart.
- > Employees must avoid physical contact with others and direct employees/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 shall maintain social distancing while inside the trailers.
- > 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. Social distancing shall also be enforced.
- > Triangle Associates understands that due to the nature of our work, access to running water for hand washing may not be possible. In these situations, Triangle Associates will provide, alcohol-based hand sanitizers and/or wipes.
- > Employees should limit the use of co-worker's tools and equipment. To the extent tools must be shared, Triangle Associates will provide alcohol-based wipes to clean tools before and after use by Triangle employees. 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 dust. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.
- > Triangle Associates will divide crews/staff into two (2) groups where possible so that projects can continue working effectively in the event that one of the divided teams is required to quarantine.
- > As part of the division of crews/staff, Triangle Associates will designate employees into dedicated shifts, at which point, employees will remain with their dedicated shift for the remainder of the project. If there is a legitimate reason for an employee to change shifts, Triangle Associates will have sole discretion in making that alteration.
- > Employees are encouraged to eliminate ride-sharing. If not possible, while in vehicle, employees must ensure adequate ventilation.
- > If practicable, employees 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 shall use individual water bottles.



> **The following items shall be identified in site specific COVID-19 Safety Plan;**

- Designated Personnel
- Screening Protocol
- Controlled Access Plan
- Site Specific PPE & Disposal
- Sanitation Procedures
- Notification Processes
- Material Delivery

> **For additional project specific precautions please refer to site safety plan**

B. WORKERS ENTERING OCCUPIED BUILDINGS

When employees perform construction and maintenance activities within occupied 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.

During this work, employees must sanitize the work areas upon arrival, throughout the workday, and immediately before departure. Triangle Associates will provide alcohol-based wipes for this purpose.

Employees shall require other occupants to keep a personal distance of six (6) feet at a minimum. Workers shall wash or sanitize hands immediately before starting and after completing the work.

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, he/she WILL NOT be permitted to access the jobsite:
 - Have you been confirmed positive for COVID-19?
 - Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
 - Have you been in close contact with any persons who has been confirmed positive for COVID-19?
 - Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
- > Site deliveries will be permitted but should be properly coordinated in line with the employer’s minimal contact and cleaning protocols. Delivery personnel shall remain in their vehicles if at all



possible. REFER TO SITE SPECIFIC SAFETY PLAN. DRIVERS ARE REQUIRED TO CHECK IN.

D. PERSONAL PROTECTIVE EQUIPMENT AND WORK PRACTICE CONTROLS

- > In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide:
 - o **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 shall not share gloves.
 - o **Eye protection:** Eye protection should be worn at all times while on-site.
 - o **NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Employees should 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:
 - o Keep dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.
 - o Limit exposure time to the extent practicable.
 - o 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.

SECTION 4 - JOB SITE CLEANING AND DISINFECTING

Triangle Associates has instituted regular housekeeping practices, which includes 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. Triangle Associates will ensure that hand sanitizer dispensers are



always filled. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected frequently.

- > Vehicles and equipment/tools should be cleaned at least once per day and before change in operator or rider.
- > If an employee has tested positive for COVID-19, OSHA has indicated that there is typically no need to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, Triangle Associates will clean those areas of the jobsite that a confirmed-positive individual may have come into contact with before employees can access that work space again.
- > Triangle Associates will ensure that any disinfection shall be conducted using one of the following:
 - o Common EPA-registered household disinfectant;
 - o Alcohol solution with at least 60% alcohol; or
 - o Diluted household bleach solutions (these can be used if appropriate for the surface).
- > Triangle Associates will maintain Safety Data Sheets of all disinfectants used on site.
- > **For additional project cleaning procedures please refer to site safety plan**

SECTION 5 - JOBSITE EXPOSURE SITUATIONS

- > **Employee Exhibiting COVID-19 Symptoms:** If an employee exhibits COVID-19 symptom, the employee IS REQUIRED TO NOTIFY Human Resources (and Triangle) and 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). Triangle Associates will similarly require an employee that reports to work with symptoms to return home until they are 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 that tests positive for COVID-19 will be sent home until cleared and released from their healthcare or medical provider. Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery; and (2) at least seven (7) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. Triangle Associates will require an employee to provide documentation clearing their return to work. Before the infected employee departs, they must identify all individuals who worked in close proximity (within six feet) for a prolonged period of time (10 or more minutes) with them during the 48-hour period before the onset of symptoms appeared. These employees need to be identified to ensure a full list of those who should be sent home.



- > **Employee Has Close Contact with a Tested Positive COVID-19 Individual:** Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be sent home and may not return to work for 72 hours from the last known occurrence of being in contact with the known employee. The CDC has released [relaxed guidelines](#) for critical infrastructure workers, as previously defined by the [Cybersecurity and Infrastructure Security Agency](#), who have been potentially exposed to COVID-19. Under the relaxed guidelines, critical infrastructure workers potentially exposed to COVID-19 may continue to work following exposure provided they remain symptom-free and employers implement additional precautions to protect the employee and the community

- > **When sending an employee home who has tested positive or has come in contact with someone who has tested positive for COVID-19:** When sending the employees home or dealing with an employee with a positive Covid-19 result, do not identify by name the infected employee(s) to ensure compliance with confidentiality laws. When working in a shared office building or area, inform management so they can take whatever precautions they deem necessary. The CDC provides that the employees who worked closely to the infected worker should be instructed to proceed based on the CDC [Public Health Recommendations for Community-Related Exposure](#). Those employees should first consult and follow the advice of their healthcare providers or public health department regarding the length of time to stay at home.

SECTION 6 - OSHA RECORDKEEPING

If a confirmed case of COVID-19 is reported, Triangle Associates 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 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 not a confirmed diagnosis), the recordability analysis would not necessarily be triggered at that time.

If an employee has a confirmed case of COVID-19, Triangle Associates 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.

Triangle Associates' 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. Further, if an employee has a confirmed case of COVID-19 that is considered work-related,



Triangle Associates 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 occurring.

SECTION 7 - "ESSENTIAL" INDUSTRY

Several States and localities are issuing orders that prohibit work and travel, except for essential businesses. If upon your travel to and from the worksite, you are stopped by State or local authorities, you will be provided a letter that you can show the authorities indicating that you are employed in an "essential" industry and are commuting to and from work.

SECTION 8 - CONFIDENTIALITY/PRIVACY

Except for circumstances in which Triangle Associates 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 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. A sample notice to employees is attached to this Plan. Triangle Associates reserves the right to inform other employees that a co-worker (without disclosing the person's name) 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.

SECTION 9 - GENERAL QUESTIONS

Given the fast-developing nature of the COVID-19 outbreak, Triangle Associates may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact our COO / Executive Vice President, Jim Conner at (616) 540-9071.