



COVID-19 Exposure Prevention, Preparedness, and Response Safety Plan

KOL Inc.

Purpose

The purpose of this plan is to outline steps that KOL and its employees can take to reduce the risk of exposure to COVID-19. The plan describes how to prevent worker exposure to coronavirus, protective measures to take on the jobsite, personal protective equipment, and work practice controls to use, cleaning and disinfecting procedures, and what to do if a worker becomes sick.

Scope

KOL 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 Exposure Prevention, Preparedness, and Response Plan to be implemented throughout KOL and at all of our facilities. We have also identified a team of employees to monitor available U.S. Centers for Disease Control and Prevention (CDC) and occupational Safety and Health Administration (OSHA) guidance on the virus.

This plan is based on currently available information from the CDC, OSHA, FDA, and State of Virginia Mandates. It is subject to change based on further information provided by the CDC, OSHA, and other public officials. KOL may also amend this plan based on operational needs.

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.

Responsibilities of Employees

We ask 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, everyone must play a part. As set forth below, KOL has instituted various housekeeping, social distancing, and other best practices at our jobsites-all employees are required to follow.

Additionally, employees are expected to report to their managers or supervisors if they are experiencing signs of symptoms of COVID-19, as described below.

If you have a specific question about this plan or COVID-19, please ask a designated team member list in the Scope of this program. If they cannot answer the question, please contact Kevin D. Orford, Vice President, 571-203-9828, and kevin@shipkol.com. OSHA, Virginia State mandates, and the CDC have provided the following control and preventative guidance to all workers, regardless of exposure risk:



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- 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.
- Maintain at least 6 feet apart.
- Encourage the use of filtering face pieces.
- Stay home and quarantine if COVID symptoms are present or tested positive.
- If you think you might have COVID-19 symptoms (fever, sore throat, fatigue, shortness of breath, dry cough) contact your health care provider and supervisor.
- Disinfect surfaces with appropriate solutions (ones that specifically say they kill human coronavirus).
 - Be cautious of other health consequences to exposure from certain cleaners.

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

- Cough;
- 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.

Facility Site Protective Measures

KOL has instituted the following protective measures at location(s).

General Safety Policies and Rules

Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the facility and return home.

- Before beginning work, upon entering the facility all employees are required to get their temperature check, wash their hands, and use hand sanitizer. A designated individual with the proper training will disinfect the location.



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- Employees will always wear their face mask properly, following training, while on shift. Discarding of the masks will be in a designated receptacle and laundered by trained personnel onsite.
- Confidential employee temperatures will be taken prior to being allowed to work daily and a questionnaire will be answered by the employee in private. Supervisors will perform this task on behalf of HR only after training, including a designated HIPAA course provided for designated supervisors. This collected and protected information will be passed along to HR and reviewed. Employees showing an elevated temperature will be asked to return home.
- 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 workstations are used, only necessary employees should enter the stations and all employees should social distancing in near proximity.
- All in-person meeting will be limited. To the extent possible, meetings will be conducted by telephone.
- 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.
- KOL will provide, when available, alcohol-based hand sanitizers and/or wipes.
- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, KOL will provide alcohol-based wipes to clean tools before and after use. When cleaning tools and equipment, consult manufacturer's recommendations for proper cleaning techniques and restrictions.
- KOL 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.
- Employees are encouraged to minimize ridesharing. While in vehicle, employees need to wear proper face mask/covering and ensure proper ventilation.
- If practicable, employees should use/drive their same mode of transportation every shift.
- In lieu of using a common source of drinking water, such as coolers/drinking fountains/faucets, employees should use individual water bottles.
- Common surfaces will be decontaminated every hour or as needed. Such surfaces include shared handles, doorknobs, countertops, money tills, and transaction stations to name a few. The supervisor on shift may include additional surfaces as needed.

Contaminated surfaces

If a surface is suspected to be potentially contaminated, the workstation and site of contamination will be cleaned immediately and operations will cease if it interferes with other personnel (employee or customer) and safe work.



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- Surfaces will be cleaned according to the “ jobsite cleaning and disinfecting” of the plan.

Customers entering locations

Customers visiting locations present unique hazards with regards to COVID-19 exposures. Customers are expected to enter each location in a designated fashion to limit probability of exposure. All such work should evaluate the specific hazards when determining best practices related to COVID-19.

- During this work, employees must maintain a disinfected work areas at all times, throughout the workday, and immediately before departure. KOL will provide approved disinfectant for this purpose.
- Employees should ask customers to keep a personal distance of six (6) feet at a minimum.
- Employees should encourage customers to use the available hand sanitizer before entering, before any interaction, and afterwards.
- Workers should wash hands immediately before starting and after completing the work.
- The number of visitors and employees in a facility will be limited to only those necessary for the work according to the regulations of the Virginia State Mandates.
- All visitors will be screened in advance of arriving at the facility. If the visitor answers “yes” to any of the following questions, he/she should 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 have 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 should remain in their vehicles, if at all possible.
- Refer to the site supervisor on how customers will traverse through the facility. This may change daily depending on customers and employee daily review of the COVID-19 Plan.

Personal Protective Equipment and Work Practice Controls

In addition to regular PPE for workers engaged in various tasks, KOL will also provide:



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- **Gloves:** Gloves should be worn at all times while on-site. The type of gloves worn should be appropriate to the task. Employees should avoid sharing gloves.
- **Eye protection:** Eye protection should be worn at all times while on-site, if appropriate.
- **Face:** Face masks/cloths will be provided by the employer. Employees are required to wear them at all times. Employees are required to wear the masks before entering and discarded when leaving shift in the appropriate receptacles for in-house laundering.

Job Site Cleaning and Disinfecting

KOL has instituted regular housekeeping practices, which include 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.

- Break, lunchroom, commonly touched surfaces, and common areas will be cleaned hourly or as needed. Employees performing cleaning will be issued proper personal protective equipment (PPE), such as nitrile, latex, or vinyl gloves, gowns, respiratory protection, and goggles as recommended by the CDC.
- Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- KOL will ensure that hand sanitizer dispensers are always filled when product is available. 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, KOL will clean those areas of the jobsite that a confirmed-positive individual may have come into contact with before employees can access that workspace again.
- KOL will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA-registered household disinfectant or an alcohol solution with at least 60% alcohol.
 - Diluted household bleach solutions (these can be used if appropriate for the surface)
 - The jobsite exposure will be determined for what surfaces will potentially be contaminated. A list and map of these exposure surfaces will be available to employees.

Employee exhibiting COVID-19 Symptoms

If an employee exhibits COVID-19 symptoms, the employee must remain at home for 14 days and until he or she is symptom free for 72 hours (three full days) without the use of fever-reducing or other



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symptom-altering medicines (e.g., cough suppressants). KOL will similarly require an employee that reports to work with symptoms to return home until they are symptom free for 72 hours (three 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 directed to self-quarantine away from work. Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (three full days) have passed since recovery; and (2) at least fourteen (14) 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. KOL will require an employee to provide documentation clearing their return to work.

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 directed to self-quarantine for 14 days from the last date of close contact with carrier. Close contact is defined as up to six (6) feet apart for a prolonged period of time.

If KOL learns that an employee has tested positive, KOL will conduct an investigation into co-workers that may have had close contact with the confirmed-positive employee in the prior 14 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. If an employee learns that he or shee 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 also self-quarantine for 14 days from the last date of close contact with the carrier.

OSHA Record keeping

If a confirmed case of COVID-19 is reported, KOL will determine if it meets the criteria for recordability and reportability under OSHA's record keeping rule, OSHA requires 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 for 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 confirmed case of COVID-19, KOL will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that



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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.

KOL'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. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, KOL will report the case to OSHA if it results in a fatality or an in-patient hospitalization with 8-hours of the exposure incident occurring.

Confidentiality/Privacy

Except for circumstances in which KOL 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. KOL 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.

General Questions

Given the fast-developing nature of the COVID-19 outbreak, KOL may modify this plan on a case-by-case basis. If you have any questions concerning this plan, please contact Kevin D. Orford, Vice President, 571-203-9828, kevin@shipkol.com.