



COVID-19 Prevention, Preparedness & Response Plan

Ondra-Huyett Associates, Inc. (hereinafter “Company” or “OHA”) recognizes that our people are the Company’s biggest asset, so we take 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, the Company must remain vigilant to protect its personnel and to help mitigate the outbreak in the public at large. In order to be safe and maintain operations, we have developed this COVID-19 Prevention, Preparedness, and Response Plan to be implemented, to the extent feasible and appropriate, throughout the Company and at all our jobsites. The Company’s Human Resource Team and Safety Committee will monitor the related guidance that the U.S. Center for Disease Control and Prevention (“CDC”), the Occupational Safety and Health Administration (“OSHA”), and other authorities having jurisdiction continue to make available.

This Plan is based on information available from the CDC, OSHA, and various authorities having jurisdiction at the time of its publication. The current environment and the manner in which the authorities are addressing, however, is fluid. Accordingly, this policy 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 its strong desire to protect employees and operational needs.

Responsibility of Managers & Supervisors

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must always set a good example by following this Plan and any reasonably risk mitigation efforts put into place by the Company. 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.

Supervisors and Managers are also expected to proactively inquire with project specific owners, design teams, or others responsible for the safety of the jobsite to inquire about project specific rules relating to COVID-19 mitigation and determine a reporting structure for issues specifically relating to COVID-19 issues that arise on the project. Where appropriate, Supervisors and managers are encouraged to submit job specific protocols beyond those required by this policy to the Company Safety Committee for approval if they are believed to be necessary to protect employees. Supervisors and Managers will submit a daily report to the Company to meet OHA requirements, but any COVID-19 related issues need to be reported immediately.

Responsibility of Employees

Employees play an important role in protecting each other from the COVID-19 outbreak. The Company is advising every one of our employees to help with prevention efforts while at work. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our jobsites. Given the importance of employee participation in these efforts, all employees will be required to read and sign this policy in order to acknowledging it.

All employees must follow these practices. 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 **John Fineran, Director of Field Operations.**

Basic Infection Prevention Measures that must be followed include:

- Practice Safe Distances (“Social Distancing”) – Maintain a minimum of 6’ clearance between individuals at all times.
- Utilize good personal Hygiene – Wash hands thoroughly and often with running water & soap (in the absence of running water & soap utilize alcohol-based hand wipes or hand sanitizer with greater than 60% alcohol). When feasible hand washing stations, hand wipes, and hand sanitizer will be provided by Company.
- Self-monitor for signs / symptoms of the COVID-19 virus (fever, achiness, dry cough, shortness of breath, etc.) If symptoms exist, notify your employer or direct supervisor immediately and remove yourself from the workplace.
- Stay home if you are sick – Do not put others at risk.
- Practice Respiratory Etiquette – Cover coughs & sneezes with your elbow not your hand; and wear a protective mask over your nose and mouth any time you are on Company property or a jobsite. Where possible, OHA will provide such face masks to OHA employees.
- Do not touch your face with unwashed hands.
- Do not share cell phones, tablets, computers, desks, office supplies, or other items which could transmit the virus.
- Avoid taking breaks and lunch near others (maintain 6’ of separation).
- Utilize technology whenever possible – rely on virtual communication like cell phones, text messaging, etc. in lieu of in person gatherings / meetings.

Know the COVID-19 symptoms:

- Coughing
- Fever
- Shortness of Breath, difficulty breathing
- 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 supervisor and healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.

Job Site Protective Measures

The Company has instituted the following protective measures at all jobsites:

- Employees or visitors to any Company property, including job sites, will have taken their temperature and recorded in a log. Any employee or visitor recording a temperature of 100.4 degrees or higher will not be permitted to enter the jobsite or other Company property. Any employee/contractor/visitor showing signs or symptoms of COVID-19 will be asked to leave the site, immediately.
- Workers must avoid physical contact with others and shall direct others (coworkers/contractors/visitors) to increase personal space to at least six (6) feet, where possible. Where work trailers or jobsite offices are used, only necessary employees should enter, and all employees should maintain social distancing while inside.
- Employees will be encouraged to stagger work breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people.
- Employees should limit the use of coworkers' tools and equipment. To the extent tools must be shared, the Company will provide alcohol-based wipes to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions. All employees are expected to clean tools and equipment used during their work shift when they are done using them.
- Employees are required to wear face masks but use of an N95 mask in particular is not required. 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. While in vehicles, employees must ensure adequate ventilation.
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles brought to the jobsite by employees each day. Employees bringing their own drinking water is the best method to prevent the spread of the virus.
- Each Subcontractor to provide OHA with a copy of their post COVID-19 procedures and protocol for review prior to starting back on the site. OHA will re-conduct the project PRECON procedure with all trade contractors prior to the restart of work on site.
- Each Subcontractor to provide their workers with all required PPE for COVID-19 mitigation, including that which is required by this Plan.
- Subcontractor's will maintain a daily sign-in sheet and report as per OHA project requirements personnel information and submit those reports to the OHA Superintendent by 9:00 a.m. each day. The OHA Superintendent will document this information on their Daily Report.
- Where feasible OHA will supply 1 Hand Wash Station (w/ hot water) centrally located.
- Temporary sanitation facilities will be cleaned 2 times a week.

- All project required meetings will be held via virtual communication, if any In-person meetings are required, participants must remain at least six (6) feet apart.
- All job site gatherings are to take place virtually where possible. In the event of a required in person meeting, it must be limited to less than 10 people and participants must remain at least six (6) feet apart.
- OHA Daily Field Reports to include all notes pertaining to public / worker safety as it relates to Infectious Disease concerns. OHA to add a COVID-19 heading to the Daily Report Form and report on issues relating to COVID-19 that arise on the jobsite.
- All Sub-contractors will be responsible (as it relates to COVID-19) for the safety & well-being of their own employees, that is to include the screening, monitoring and reporting of the quality and wellness of their workforce daily to the OHA Site Superintendent.
- In addition to the Hard Hats & task required PPE, face masks are now a required standard PPE requirement for this project.
- Elevator usage will be limited to one person only and stair tower usage will need to limit the need for passing of one another on the stairs.

Job Site Visitors

- The number of visitors to the job site, including the trailer or office area, will be limited to only those necessary for the work.
- All visitors will be screened in advance of arriving on the job site. If a visitor answers “yes” to any of the following questions, he/she should not be permitted to access the jobsite. Before admission, each individual accessing the jobsite will provide a signed document certifying their answers to these questions:
 - 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?
 - My temperature as recorded prior to my entry at the job site today was 100.4 degrees or less.
- 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.

PPE & Work Practice Controls

- Perform daily Work Task Assessments, this should include discussions regarding social distancing, access to the workspace, material and trade contractor requirements.
- In addition to regular PPE, Gloves and Eye Protection are also suggested.
- The following Work Practice Controls should be followed:

- Wear required face masks.
- Keep dust down by using engineering and work practice controls, specifically using water delivery and dust collection.
- Limit the exposure time to the extent possible.
- Isolate workers in dusty operations by using a containment structure.
- Institute a rigorous housekeeping program to reduce dust levels on the jobsite.
- OSHA to post COVID-19 signage prominently throughout the project site as a reminder for COVID-19 awareness and procedures.
- Ongoing work tasks will need to be scheduled so that trades / workers can maintain the six (6) feet individual space requirement. Work shifts and break times will be staggered where practical to limit interaction between individuals.

Job Site Cleaning and Disinfecting

The Company has instituted regular housekeeping practices, which include cleaning and disinfecting high touch areas, 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”) and trash gathered or created from these cleaning efforts will be immediately bagged and disposed of in an appropriate manner.
- Any trash collected from the jobsite must be changed frequently by someone wearing PPE.
- Any portable jobsite toilets should be cleaned by the leasing company at least twice per week and disinfected on the inside daily. Frequently touched items (i.e. door pulls and toilet seats) will be disinfected more frequently as needed.
- Vehicles and equipment/tools should be cleaned and disinfected at least once per day and before change an operator or rider.
- OSHA has indicated that a reliable report that an employee has tested positive for COVID-19 does not necessarily 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 workspace again.
- The Company will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA-registered household disinfectant.
 - Alcohol solution with at least 60% alcohol; or
 - Diluted household bleach solutions (if appropriate for the surface).
- **It is important for every employee and visitor to understand and be cognizant that even though good faith attempts and practices to provide a clean and safe workplace have been**

put in place, the ultimate responsibility for safety resides with each individual employee and visitor who enters the project site. Each person needs consider the risk and conduct themselves appropriately while on site.

Jobsite Exposure Situations

- **Employee Exhibits COVID-19 Symptoms**

If an employee exhibits COVID-19 symptom, the employee 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). The Company will similarly require an employee who reports to work with symptoms to return home until he or she is 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. It is within the sole discretion of OHA to determine if an employee poses a health risk due to COVID-19 to OHA employees or others on the jobsite.

- **Employee Tests Positive for COVID-19**

An employee who tests positive for COVID-19 will be directed to self-quarantine away from work. 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: (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. OHA reserves the right to require a note from an appropriate health care provider clearing an employee to come back to work in the event of a possible COVID-19 exposure or illness.

Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers. The Company will require an employee to provide documentation clearing his or her return to work.

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

Employees who have come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise) will be directed to self-quarantine for 14 days from the last date of close contact with that individual. Close contact is defined as being within six (6) feet for a prolonged period.

If the Company learns that an employee has tested positive, the Company will conduct an investigation to determine co-workers who may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals who have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with that employee. If applicable, the Company will also notify any sub-contractors, vendors/suppliers or visitors who may have had close contact with the confirmed-positive employee. 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 that individual.

OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for record-ability and report-ability 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 is not a confirmed diagnosis, the record-ability 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.