



COVID-19 PREPAREDNESS AND RESPONSE PLAN

ControlNET, LLC 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 the Company, 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.

I. 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 worksite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

II. 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, the Company 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 the Human Resources Department.

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 employees develop a fever and symptoms of respiratory illness, such as an atypical cough or shortness of breath, they must not to report to work, notify their supervisor immediately, and consult their healthcare provider. Likewise, if employees come into close contact with someone showing these symptoms, they must notify their supervisor immediately and consult their healthcare provider. The Company also will work to identify any 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. Instead, the CDC defines “close contact” as either:

- Being within approximately six feet of a COVID-19 infected person or a person with any COVID-19 symptom(s) for a “prolonged period of time;” or
- Having direct contact with infectious secretions of a COVID-19 infected person or a person with any COVID-19 symptom(s) (e.g., being coughed on).

There is no precise definition of “prolonged period of time.” CDC estimates range from 10 to 30 minutes. To protect employees, we are using the lower end of this range and consider a prolonged period to be 10 or more minutes of exposure.

III. Worksite Preventative Measures

The Company has instituted the following protective measures at all worksites.

A. Infectious Disease Control Policy

- We ask all employees to cooperate in taking steps to reduce the transmission of infectious disease in the workplace by doing the following:
 - Proper hygiene etiquette:
 - The best strategy remains the most obvious—frequent hand washing with warm, soapy water; covering your mouth whenever you sneeze or cough; and discarding used tissues in wastebaskets. To help stop the spread of germs, cover your mouth and nose with a tissue when you cough or sneeze. Put your used tissue in a wastebasket. If you don’t have a tissue, cough or sneeze into your upper sleeve, not your hands. Remember to wash your hands each time after coughing or sneezing with soap and water. If water is not available, use an alcohol-based hand sanitizer that contains at least 60% alcohol to clean hands.
 - Stay home when ill:
 - Many times, with the best of intentions, employees report to work even though they feel ill. We provide paid time off and other benefits to compensate employees who are unable to work due to illness. Sick employees are actively encouraged to stay home. During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing the



following symptoms: fever, cough, sore throat, runny or stuffy nose, body aches, headache, and chills. Currently, the Centers for Disease Control and Prevention recommends that people with an infectious illness such as the flu remain at home until at least 24 hours after they are free of fever ($\leq 100.4^{\circ}\text{F}$) or signs of a fever without the use of fever-reducing medications. Employees who report to work ill will be sent home in accordance with these health guidelines.

- Limit travel:
 - All nonessential travel should be avoided until further notice. Employees who travel as an essential part of their job should consult with management on appropriate actions. Business-related travel outside the United States will not be authorized until further notice. Employees should avoid crowded public transportation when possible. Alternative scheduling options, ride-share resources and/or parking assistance will be provided on a case-by-case basis. Contact human resources for more information.
- Telecommuting:
 - Telework requests will be handled on a case-by-case basis. While not all positions will be eligible, all requests for temporary telecommuting should be submitted to your manager for consideration.
- Social distancing guidelines for worksite infectious disease outbreaks:
 - Avoid meeting people face-to-face. Employees are encouraged to use the telephone, online conferencing, e-mail or instant messaging to conduct business as much as possible, even when participants are in the same building.
 - If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room and sit at least one yard from each other if possible; avoid person-to-person contact such as shaking hands.
 - Avoid any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops and training sessions.
 - Do not congregate in work rooms, pantries, copier rooms or other areas where people socialize.
 - Bring lunch and eat at your desk or away from others (avoid lunchrooms and crowded restaurants). Jobsite crews are encouraged to eat their lunch in their vehicles rather than the job trailer.
- Encourage others to request information and orders via phone and e-mail in order to minimize person-to-person contact. Have the orders, materials and information ready for fast pick-up or delivery.



B. COVID-19 Self-Reporting Survey for Worksites

- Until further notice, in an effort to restrict employees from the workplace if they display symptoms of COVID-19, prior to arriving at their designated worksite, employees are required to record their temperature and answer the following questions:
 - Have you experienced any cold or flu-like symptoms in the last 14 days? This would include fever, cough, sore throat, respiratory illness, and/or shortness of breath.
 - Have you had a temperature ≥ 100.4 ° F in the last 24 hrs.?
 - Have you had close contact with or cared for someone diagnosed with COVID-19 within the last 14 days?

C. Return to Work Policy

- An employee who misses work due to cold or flu-like symptoms may return to work by following the protocol described below:
 - Supervisors should notify the appropriate designated assessor that an individual has missed work due to cold or flu-like symptoms.
 - Once the employee is symptom-free and a temperature below 100.4° F for 24 hours without medication, the employee can contact the designated assessor to schedule a health evaluation prior to returning to work.
 - The employee will be cleared to return to work if the temperature is below 100.4° F and there are no signs of cough, sore throat, or respiratory illness.
 - The designated assessor will then notify the individual's supervisor that the individual has been cleared to return to work. If the supervisor has not received notice and the previously sick individual returns to work, the supervisor should isolate the individual and contact the designated assessor to determine if proper protocol has been followed before allowing the individual into the worksite.
- Any employee who misses work due to "principle symptoms" of COVID-19, can return to work after seven days since initial symptoms and symptom-free for three days. Once both requirements are satisfied, the individual can contact their designated health assessor to schedule a health evaluation. A health evaluation must still be completed before individual can return to work. Principle symptoms are defined as:
 - A fever (≥ 100.4 ° F)
 - A typical cough
 - A typical shortness of breath

D. Job Site Visitors

- Until further notice, office doors will be locked and only accessible by employee via key card. This is in effort to prevent non-essential individuals from entering the buildings.



- 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 should not be permitted to access the jobsite:
 - Have you experienced any cold or flu-like symptoms in the last 14 days? This would include fever, cough, sore throat, respiratory illness, shortness of breath.
 - Have you had a temperature > 100.4° F in the last 24 hrs.?
 - Have you been in close contact with any persons who has been confirmed positive for COVID-19 within the last 14 days?
- 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.

E. 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:
 - 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 should avoid sharing gloves.
 - Eye protection: Eye protection should be worn at all times while on-site.
 - **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:
 - Keep dust down by using engineering and work practice controls, specifically through the use of water delivery and dust collection systems.
 - Limit exposure time to the extent practicable.
 - 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.

F. General Safety Policies and Rules

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



- Safety meetings will be by telephone or virtual method, if possible. If safety meetings are conducted in-person, attendance will be collected verbally and the foreman/superintendent will sign-in each attendee. Attendance will not be tracked through passed-around sign-in sheets or mobile devices. During any in-person safety meetings, avoid gathering in groups of more than 10 people and 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 should maintain social distancing while inside the trailers.
- All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone or virtual method.
- Employees will be encouraged to take breaks and lunches separately, without the use of a common area in a effort to continue social distancing measures.
- The Company understands that due to the nature of our work, access to running water for hand washing may be impracticable. In these situations, the Company will provide, if 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, 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.
- 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.
- The Company 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, the Company 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, the Company will have sole discretion in making that alteration.
- Employees are encouraged to minimize ride-sharing. 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 should use individual water bottles.



IV. Worksite Cleaning and Disinfecting

The Company 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.

- Worksite 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 worksite 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. The Company 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, the Company will clean those areas of the worksite that a confirmed-positive individual may have come into contact with before employees can access that work space 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 (these can be used if appropriate for the surface).
- The Company will maintain Safety Data Sheets of all disinfectants used on site.

V. Worksite Exposure Situations

A. Employee Exhibiting COVID-19 Symptoms

- If an employee exhibits COVID-19 symptoms, 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 that reports to work with symptoms to return home until they are symptom free for 72 hour (3 full days). 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

- An employee that 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 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;¹ 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 and have passed their health evaluation per Return to Work policy. The Company will require an employee to provide documentation clearing their return to work.

C. 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 the carrier. See definition of “close contact” under II. Responsibilities of Employees.
- If the Company learns that an employee has tested positive, the Company 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 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 also self-quarantine for 14 days from the last date of close contact with the carrier.

D. COVID-19 Exposure Action Plan

- The action plan will immediately follow the removal of an employee who has become ill while working in one of the office areas, fabrication facilities, or on a job site.
- As per the CDC guidelines for businesses and employers, an employee found to be sick while on the job or to present symptoms associated with the COVID-19 virus (i.e., fever, a typical cough, atypical shortness of breath) will be immediately removed from contact with other employees, taken to a separate room and fitted with a paper mask. If possible, the employee will be sent home immediately or kept separated from others until an appropriate person is available to assist in taking them home.

¹ Recovery is defined as: (1) resolution of fever with the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).



- The steps for implementation of the COVID-19 Exposure Action Plan are as follows:
 - The Company will work with the employee who tested positive and with state and local health officials to identify all other employees who were in close contact with infected employee.
 - Employees determined to be in close contact with infected employee will be sent home for 14 days from last close contact with infected employee, per EO 2020-36.
 - All areas that were used by the sick individual will be recognized and closed off to all other employees. This will include, but is not limited to: workstations, bathrooms, breakrooms, vehicles, etc. All such areas will be marked with “caution” tape, “do not enter” signage, and any other barricades or markings deemed necessary to keep others from entering the area.
 - If possible, windows and doors to the outside will be opened to allow for ventilation of the affected area. Of course, this will not be done if such ventilation could result in creating a more dangerous environment for other employees.
 - The sectioned off area will be left for 24 hours before cleaning and disinfecting.
 - A mix of soap/detergent and water will be used to do a preliminary cleaning of all hard surfaces in the contaminated areas.
 - Following the preliminary cleaning, a deep cleaning will be done in the contaminated area using a solution of diluted bleach and water (1/3rd cup bleach per gallon of water)
 - The disinfecting will continue with all tools and equipment used or believed to have been used by the sick employee being thoroughly cleaned using the diluted bleach and water solution or a recommended disinfectant, such as Clorox Multi Surface Cleaner, or Clorox Cleanup Cleaner and Bleach.
 - Those involved in the cleanup process will be trained in the above noted procedure and in the proper use of PPE used during this process (safety glasses, rubber gloves, shoe covers, Tyvek suits, paper masks, face shields). All PPE items will be used only once during cleaning and disposed of by double bagging and being placed in a waste dumpster.
 - Upon completion of the cleaning process all face shields, safety glasses, ear plugs, welding sleeves, welding jackets, coveralls, writing utensils, etc. will be double bagged and dispose of in a waste dumpster.
 - All personal items of the sick employee which have been left in the area will be double bagged and stored in a secure area for at least 72 hours.
 - This action plan will be followed at all company facilities and job sites. While the above steps address the specific needs of a comprehensive plan, per the current understanding of the Coronavirus, we do recognize that each site is unique and may require some special considerations. Our Action Plan does include the evaluation of each site to be done prior to beginning the cleanup process.



VI. OSHA Recordkeeping

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. 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, 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, 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 occurring.



VII. “Essential” Industry

Several States and localities are issuing orders that prohibit work and travel, except for essential businesses. In general, construction work has been deemed essential and the Company is committed to continuing operations safely. 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.

VIII. Confidentiality/Privacy

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. 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. The Company 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.