



# CHERRY REPUBLIC®

## COVID-19 Preparedness Response Plan

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### Scope

To provide guidance to Cherry Republic employees throughout the company, at various levels of responsibility, on how to continue operations during the COVID-19 Pandemic. This Plan will remain in place until further notice, in accordance with all State Executive Orders and Executive Directives.

### Goal

To protect Cherry Republic employees and our customers from harm resulting from exposure to COVID-19 while they are in our Retail Store locations, Cherry Public House (Pub), Cherry Factory, Distribution and Fulfillment Center (DFC), and our administrative offices.

### Overview

Under Michigan Executive Orders, a COVID-19 Preparedness Response Plan (“Plan”) has been mandated for all businesses to ensure the fullest possible health and safety protocols. This Plan will serve as a broad, company-wide plan for Cherry Republic (“the company”).

This plan has been created using CDC guidance, State and Local Health Department Guidance, as well as the OSHA document titled, “OSHA Guidance on Preparing Workplaces for COVID-19.”

The Occupational Safety and Health Administration (OSHA) has determined four levels of risk for employers and employees. Most American workers fall in the lower exposure risk or medium exposure risk levels.

## Risk Levels:

1. **Very high exposure risk** jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures. Workers in this category include: doctors, nurses, paramedics, dentists, other emergency medical technicians, laboratory personnel in a healthcare setting, and morgue personnel.
2. **High exposure risk** jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include: healthcare delivery and support staff, medical transport workers, and mortuary workers.
3. **Medium exposure risk** jobs include those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. Workers in this category may include schools, high population work environments, and some high-volume retail settings.
4. **Low exposure risk** jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within 6 feet of) suspected COVID-19 patients. Workers in this category have minimal occupational contact with the public and other coworkers.



According to the OSHA guidelines, Cherry Republic falls within the low exposure risk category for COVID-19.

## **General Framework**

### COVID-19 Program

**Employees** are required to follow workplace programs such as:

- social distancing
- respiratory etiquette
- vigilant sanitation and hygiene, including regular handwashing and use of disinfectants on surfaces
- no-touch guidelines
- required PPE (including face coverings, masks, and/or shields)
- daily health screenings for all on-site workers and contractors

Please refer to the “Company Protocols” section below for in-depth guidelines.

**Customers** will be asked to:

- follow social distancing of 6 feet or more while inside or on patios
- follow signs and floor demarcation for one-way traffic flow in our stores
- observe physical barriers necessary to directional flow and observance of social distancing
- wait in an outdoor queue if our store or pub is at occupancy limit
- wear a face covering or mask while inside our stores and/or pub
  - accommodations for those unable to tolerate a mask are:
    - online ordering and shipping
    - mail order shopping and shipping
    - Easy As Pie Curbside Pick-up

Special shopping hours will be set aside weekly for seniors and others who are considered high risk for coronavirus. Only customers who meet this criteria will be permitted to shop during these limited times. Hours may vary by location and customers may call for additional details:

- ☐ Ann Arbor, (734) 585-5231
- ☐ Charlevoix, (231) 226-3006
- ☐ Frankenmuth, (231) 226-3039
- ☐ Glen Arbor, (231) 226-3033
- ☐ Holland, (231) 226-3013
- ☐ Traverse City, (231) 932-9205

**Administrative Controls**

All employees who are able to work from home are encouraged to work from home as much as possible. We recognize that some work must be done in person and some travel to and from the office is permitted on a minimum basis.

Daily employee screenings will take place for employees working on-site under the direction of the various health department emergency orders from the counties in which stores are located and/or state executive orders. Contractors working on-site will also be required to take part in a screening in order to work on premises.

Shift start and end times may be staggered to accommodate for social distancing. In addition, break times will also be staggered and occupancy limits will be posted for each break room, depending on size.

Gatherings of any size, indoors or outdoors, will be restricted when social distancing of 6 feet or more cannot be maintained.

Meetings are strongly encouraged to take place online or via telephone. Meetings that must be face to face should have a limited number of people and social distancing protocols must be practiced.

Use of shared items should be limited. Each employee should keep their own pens, staplers, scissors, etc. In regard to shared high-touch items, such as copiers, printers, postal machines, whiteboards, microwaves, coffee machines, refrigerators, etc., these should be wiped down with disinfectant (wipes or traditional spray with paper towels) after each use. High-touch areas, such as restrooms, door handles, break room counters, etc. should be wiped down as frequently as possible, but at least at the start of the day, midday, and the end of each day. Cleaning staff will continue their work in cleaning and sanitizing, however each employee is expected to do their part to regularly clean and disinfect as well.

During the pandemic, the number of outside visitors will be limited in our buildings. Suppliers, delivery drivers (such as FedEx, UPS, USPS, etc.), and other vendors may enter a facility so long as they are not symptomatic. All visitors who come inside any Cherry Republic facility must sign the visitor log for traceability purposes.

New employees' (including returning seasonal employees) start dates may be postponed due to the pandemic. Any new employees who are approved to begin working during the pandemic may be subject to a health screening before starting their work.

### **Environmental Controls**

The company will supply additional cleaning and disinfecting supplies. Employees will be expected to regularly practice proper hygiene, respiratory etiquette, and regular disinfection of their work areas. Each manager will direct employees to the location(s) of their cleaning/sanitation stations or supply areas.

Sanitation teams will input extra efforts to cleaning and sanitizing. Administrative offices will have contracted cleaners cleaning additional nights in facilities where employees are working.

Proximity badges will be used at all time clocks in order for the actions of clocking in and out to be touchless.

Trash bins should be emptied daily, at minimum, to reduce exposure to waste products such as tissues, used gloves/face masks, or other items. All trash bins should be no-touch: either fully open receptacles or those able to be opened with a foot pedal or motion detection.

The company will keep sufficient stock of soap and other hand cleaning supplies, as well as tissues for consistent respiratory etiquette. When available, the company will provide hand sanitizer and/or hand sanitizing wipes.

The company will provide face masks (PPE) for employees. Employees may choose to wear their own face masks or coverings in accordance with CDC guidelines.

Each location will have designated points of entry. Signage and/or demarcation will be used for social distancing measures.

At least one COVID-19 Worksite Supervisor will be on-site, at each location, during work hours and when one or more employees are working. All Directors, Managers, Assistant Managers, and Supervisors are designated as our COVID-19 Worksite Supervisors. The role of the COVID-19 Workplace Supervisor is to ensure that all COVID-19 safety protocols and procedures are being followed. Please see the "Company Protocols" section for more details.

Each location will designate an Isolation Room. This room will be used to isolate any employee who is exhibiting symptoms consistent with COVID-19. They must remain in isolation until they are ready to leave the building. Please contact the health department for instructions on how to handle a suspected COVID-19 case. Once the person has left, the isolation room will be fully sanitized as well as all other areas in which the isolated person was last working.

## **Human Resources (HR) Considerations**

Employee status:

Managers must communicate the status of each employee going on leave or returning from leave to the Payroll and Benefits Manager as soon as possible to avoid payroll delays.

Absenteeism:

1. Time off and other leave status information will be communicated to both management staff and employees as necessary.
2. A *Temporary PTO policy* has been put into place which outlines the eligibility of the use of PTO time. An employee who is taking sick time or out on other approved leave will not be eligible to use PTO. In addition, any employee who is laid off or otherwise inactive in our payroll system, is not eligible to use PTO.
3. HR recognizes that employees taking sick leave may not be able to provide documentation from a healthcare provider due to limited medical staffing resources. Applications for leave will continue to be processed within the Cherry Republic Human Resources Department in a timely manner. However, third party resources may still require employees to provide medical documentation during this time. Also, a letter from a healthcare provider may be necessary in order to return to work after a positive COVID-19 diagnosis.
4. Use of leave under the Families First Coronavirus Response Act (FFCRA), such as Emergency Paid Sick Leave and Expanded FMLA application forms are available through the Payroll and Benefits Manager. See below for guidance on FFCRA eligibility and use:

**Families First Coronavirus Response Act (FFCRA):**

Under the FFCRA, an employee qualifies for expanded family and medical leave if the employee is unable to work (or unable to telework) due to a need for leave because the employee:

1. is subject to a Federal, State, or local quarantine or isolation order related to COVID-19\*;
2. has been advised by a health care provider to self-quarantine related to COVID-19;
3. is experiencing COVID-19 symptoms and is seeking a medical diagnosis;
4. is caring for an individual subject to an order described in (1) or self-quarantine as described in (2);
5. is caring for a child whose school (elementary and secondary, does not include college) or place of care is closed (or child care provider is unavailable) for reasons related to COVID-19; or
6. is experiencing any other substantially-similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretaries of Labor and Treasury.

Under the FFCRA, an employee qualifies for expanded family and medical leave if the employee is caring for a child whose school or place of care is closed (or child care provider is unavailable) for reasons related to COVID-19.

*\*Note: The U.S. Department of Labor ruled that states, such as Michigan, with “Stay Home, Stay Safe” orders did not qualify as isolation or quarantine as defined by the FFCRA.*

#### FFCRA Duration of Leave:

- For reasons (1)-(4) and (6): A full-time employee is eligible for 80 hours of leave, and a part-time employee is eligible for the number of hours of leave that the employee works on average over a two-week period. This is Emergency Paid Sick Leave (EPSL).
- For reason (5): A full-time employee is eligible for up to 12 weeks of leave (two weeks of paid sick leave followed by up to 10 weeks of paid expanded family & medical leave) at 40 hours a week, and a part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period. This is Expanded Family Medical Leave.

#### FFCRA Calculation of Pay:

- For leave reasons (1), (2), or (3): employees taking leave are entitled to pay at either their regular rate or the applicable minimum wage, whichever is higher, up to \$511 per day and \$5,110 in the aggregate (over a 2-week period).
- For leave reasons (4) or (6): employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$2,000 in the aggregate (over a 2-week period).
- For leave reason (5): employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$12,000 in the aggregate (over a 12-week period).

#### Layoff and Recall:

1. Layoffs may be necessary during the pandemic due to lack of work, when business segments are closed due to Federal, State, or Local order, or due to various other business needs.
2. Employees on layoff will be given an Unemployment Notice through their manager and information on filing with the Michigan Unemployment Insurance

Agency (UIA). Employees are solely responsible for filing and certifying claims in accordance with UIA protocol.

3. Recall will be enacted when business segments reopen and/or additional work becomes available. Recall is at the discretion of the leadership team, managers, and department needs. Recall may be at full time, part time, or other limited hours of work.

#### Executive Order 2020-36:

Under EO 20-36, employers are prohibited from discharging, disciplining or retaliating against employees who stay home if they meet certain criteria outlined in the Order.

The criteria includes:

- Individuals who test positive for or show one or more of the symptoms of COVID-19
- Individuals who have had close contact with someone who tests positive for COVID-19 or displays one or more of the symptoms

The Order in full can be found at [www.michigan.gov](http://www.michigan.gov)

#### Legislative Updates and Other Changes:

Legislative updates and other regulatory changes will be communicated to staff in a timely manner. This may include, but is not limited to:

- Families First Coronavirus Response Act (FFCRA)
- CARES Act
- Michigan Executive Orders
- Health Department Emergency Orders

#### Healthcare Coverage:

HR will continue to work with insurance companies (e.g., those providing employee health benefits) and state and local health agencies to provide information to workers regarding continued coverage and expanded coverage due to COVID-19

#### Communication:

Regular communication will be sent to staff as it applies to their current work status. HR will maintain an updated employee contact list, including email and physical addresses.

Continuance of regular compliance issues, including payroll, benefits, policies & procedures will remain in place.

## **Business Continuity Plan**

Working with Federal, State, and local agencies, the company will follow all directives as required by law.

All efforts will be made to continue operations until a restriction is put into place by the Federal, State, or local government. Any documents to continue work, with restrictions in place, will be provided in partnership with the company's legal counsel. The company will provide letters to employees under the law.

Cherry Republic continues to serve as part of Critical Infrastructure under the Food & Agriculture sector. Our business continues to operate under the law. *Opinion Letter for Critical Infrastructure and Basic and Minimum Operations* has been prepared by our legal counsel and is available to law enforcement or authorized agencies upon request.

Contingency plans for increased absenteeism due to illness or other COVID-19 factors include, but are not limited to, the following considerations:

- Reduction of hours: shortened weeks, shifts, or days
- Temporary closures or shut-downs
- Implementation of Appreciation Pay for FLSA Non-Exempt essential workers
- PTO bonus for FLSA Exempt essential workers
- Transfer of employees from one department to another for business needs
- Recall with reduced hours with qualification for underemployment benefits

Economic factors may require adjustments to our normal business plan. These adjustments may include, but are not limited to, the following:

- Restriction of non-essential business purchases
- Spending approvals
- Temporary suspension of certain programs (e.g. travel, training, company events)
- Reduction of hours: shortened weeks, shifts, or days
- Temporary closures or shut-downs
- Reduction of overtime hours
- Transfer of employees from one department to another
- Layoff
- Voluntary separation

Following the passing of State and Federal relief programs, the company continues to pursue programs that will allow for a position of financial strength during this impact period.

### **COVID-19 Workplace Taskforce (Workplace Coordinators)**

Executive leadership, along with the HR Director, will be vigilant and stay informed about the COVID-19 pandemic as it continues to evolve. They will keep administrative and front-line leadership briefed as needed on potential risks or other circumstances. The Workplace Taskforce will also prepare company-wide communications as necessary. Information may include, but is not limited to:

- How the virus/disease spreads
- Hygiene and other safety protocols
- Symptoms of the disease
- Federal, state, and local legislation
- CDC recommendations and guidelines
- Internal policies and procedures

### **COVID-19 Worksite Supervisor(s)**

At least one COVID-19 Worksite Supervisor will be on-site, at each location, during work hours and when one or more employees are working. The role of COVID-19 Worksite Supervisors is to monitor all COVID-19 safety protocols and procedures, at minimum:

1. Workplace infection-control practices. (Social distancing, handwashing, cleaning & disinfecting, etc.)
2. The proper use of personal protective equipment. (Wearing of masks, shields, or other PPE)
3. Steps employees must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19. (Including use of our daily health screenings, reporting illness to supervisor or manager immediately, whether on or off duty, and not reporting to work when sick.)
4. How to report unsafe working conditions. (Reporting to the supervisor or manager on duty)

Cherry Republic's designated COVID-19 Worksite Supervisors include, at minimum, those with the following titles:

Directors

Managers

Assistant Managers

Supervisors

### **Operations Plan**

The company will maintain a supply of cleaning products, paper products (such as tissue and paper towels), and will make every attempt to have location-specific personal protective equipment (PPE), which may vary by department, available to employees. Due to limited supply of gloves and face masks, the company may not be able to supply our typical PPE. Because of these limited resources, employees may be issued alternative PPE, such as alternative sources, alternative brands, and in the case of face masks, cloth face masks (as advised by the CDC) and/or plastic face shields may be supplied. All PPE will meet regulatory standards. Employees may also choose to bring their own cloth face masks to work. Face masks should be properly worn over the nose and mouth, they should be donned and doffed properly, and regularly cleaned/sanitized. Please see CDC guidelines for masks.

Administrative offices will follow the general guidance as outlined in this broad preparedness plan. In addition, a Return To Office Policy has been prepared for all office staff and follows the guidance of OSHA, CDC, and Michigan Executive Orders.

Fulfillment and production operations will follow the general guidance as outlined in this broad preparedness plan. In addition will develop plans with their vendors for re-supply of product, packing/shipping supplies, cleaning products, and sanitizing agents. Employees will follow all company policies in place for safe food manufacturing, including safe handling, sanitation, hygiene, and cleanliness will stay in place with additional information as outlined in the *manufacturing and distribution preparedness plan*. A sub-plan for Production and Warehouse staff is available upon request and follows the guidance of OSHA, CDC, and Michigan Executive Orders.

Customer-facing segments, such as Retail stores and Cherry Public House, will follow the general guidance as outlined in this broad preparedness plan. In addition will develop plans with their vendors for re-supply of products, supplies, cleaning and sanitizing agents. Employees will follow all company policies in place for safe food handling, sanitation, hygiene, and cleanliness. A sub-plan for our customer-facing staff is available upon request and follows the guidance of OSHA, CDC, and Michigan Executive Orders.

## **Company Protocols**

### **Daily Health Screenings**

Under the guidance set forth by local health departments in the following counties, we have created company-wide daily health screenings for employees and on-site contractors:

Benzie & Leelanau Counties (District Health Department)  
Charlevoix County (Health Department of Northwest Michigan)  
Grand Traverse County  
Ottawa County  
Saginaw County  
Washtenaw County

In addition to local Health Department Emergency Orders, Michigan Executive Orders also require that all employees (state-wide) performing in-person work (on-site) be screened.

Health screening questions inquire about fever, cough, sore throat, vomiting/diarrhea, feeling feverish or experiencing chills, muscle aches, new loss of taste or smell, and difficulty breathing. It also screens for travel outside of the State of Michigan, contact with persons confirmed to have COVID-19, and whether a person has been placed under a medical quarantine or isolation. These screenings will continue daily until further notice.

Cherry Republic reserves the right to send any employee who does not pass a daily screening, or who becomes ill during a working shift, home according to guidelines below:

In accordance with Michigan Executive Orders, employees who exhibit any symptoms as outlined in the daily health screening must self-isolate at home and contact their doctor for direction. If the employee tests positive for COVID -19:

- Must isolate at home for minimum of 10 days since symptoms first appear, AND
- Must also have 3 days without fevers and improvement in respiratory symptoms before returning to work.

In accordance with Michigan Executive Orders, employees who have been ordered to self-isolate or self-quarantine, or have had contact with a person or persons known to have COVID-19:

- Must self-quarantine at home for 14 days.

In accordance with the CDC, employees who have traveled from a location (domestic or international) with widespread ongoing transmission or any travel on cruise ship or river boat:

- Must self-quarantine at home for 14 days.

In accordance with the CDC, employees who have traveled from a location (domestic or international) with ongoing community transmission:

- Must practice social distancing

Be alert for symptoms

### **Research and signs of disease**

The Workplace Taskforce and HR Department will continue research of the specific signs, symptoms, incubation period, and route of infection, the risks of exposure, and the recommendations for businesses as provided by the CDC, Occupational Health and Safety Administration (OSHA), and other relevant local, state and federal public health agencies.

A wide range of **symptoms** have been reported for COVID-19. The CDC states that the most common symptoms are:

- Fever (typically above 100.4 degrees fahrenheit)
- Cough (usually a dry cough)
- Shortness of breath or difficulty breathing

Additional symptoms may include:

- Chills
- Repeated shaking with chills
- Muscle aches
- Headache
- Sore throat
- New loss of taste or smell
- Diarrhea or vomiting

When an employee is sick, they must stay home and not come into work. The company reserves the right to send home any employee exhibiting any signs of illness as listed above or otherwise.

Upon the health advice from local and state public health authorities, and other agencies as appropriate, the company will review and revise internal policies and procedures. HR and/or department directors and managers may stock up on certain supplies, environmental cleaning agents, and personal protective equipment as necessary.

### **Safe Work Practices**

All employees will be educated on the exposure risks, symptoms, and prevention of COVID-19 through a combination of emails, physical postings, verbal communications,

and formal training. Emphasis has been placed **safe work practices** such as basic infection prevention and control, such as:

- **Hand washing and sanitizing** - employees should regularly wash hands for at least 20 seconds with soap and warm water. The company will continue to supply hand soap and encourage employees to wash hands frequently, permitting extra time to do so. When soap is unavailable, a hand sanitizer gel or spray with at least 70% alcohol content may be used. Upon entry to the work location(s), employees should wash or sanitize their hands. Employees are also advised to avoid touching their faces, especially eyes, nose, or mouth.
- **No Touch** - employees are discouraged from shaking hands or other forms of physical contact with other employees, vendors, or other on-site personnel. Everyone is encouraged to greet one another with a smile, wave and/or verbal acknowledgements.
- **Respiratory Etiquette** - employees should properly cover all coughs and sneezes using a tissue or the inside of the elbow. All tissues should be disposed of, in the trash, immediately. The company will continue to supply tissues.
- **Cleaning and Sanitizing** - employees should increase their efforts to clean and disinfect their work areas. It is advised to wipe down commonly touched surfaces at the start of each shift, after breaks, and before leaving for the day. In addition, employees should refrain from using other workers' phones, desks, offices, or other work tools and equipment, when possible.
- **Social Distancing** - employees are expected to follow all rules of social distancing, including staying a minimum of 6 feet from other employees while working, taking breaks, or other activity. Groups of people congregating in break rooms, common areas, or parking lots is strictly prohibited. Meetings are encouraged to take place through Zoom, telephone, or other remote options. When meetings must take place in-person, the number of guests should be strictly limited to those necessary.
- **Wearing a Face Mask** - face masks help limit the spread of germs. When someone talks, coughs, or sneezes they may release tiny drops into the air that can infect others. If someone is ill, a face mask can reduce the number of germs that the wearer releases and can protect other people from becoming sick. A face mask also protects the wearer's nose and mouth from splashes or sprays of body fluids. Face masks must be worn at all times while working on-site with others, since a 6-foot social distance may not be maintained consistently.

The greatest risk of transmission is touching droplets and subsequent touching of eyes, nose, and mouth. According to the CDC, the virus can live for a limited number of hours on various surfaces (not days) and it can be killed with soap and/or disinfection.

Since COVID-19 may have a low risk of transmission through airborne routes, we also allow for disinfection using an aerosol spray such as Lysol. Also, employees must continue to follow all respiratory etiquette.

The wearing of masks, which cover the nose and mouth, will be essential in limiting the spread of droplets. Masks not only provide some protection for the wearer, but for others who encounter the wearer. In some instances, face shields may also be used to provide additional protection:

- How to put on a face mask
  1. Clean your hands with soap and water or hand sanitizer before touching the mask.
  2. If your mask is disposable, remove from the box and make sure there are no obvious tears or holes in either side of the mask.
  3. Follow the instructions below for the type of mask you are using.
    - a. Face Mask with Ear loops: Hold the mask by the ear loops. Place a loop around each ear.
    - b. Face Mask with Ties: Bring the mask to your nose level and place the ties over the crown of your head and secure with a bow. Then take the bottom ties, one in each hand, and secure with a bow at the nape of your neck.
    - c. Face Mask with Bands: Hold the mask in your hand with the nosepiece or top of the mask at fingertips, allowing the headbands to hang freely below hands. Bring the mask to your nose level and pull the top strap over your head so that it rests over the crown of your head. Pull the bottom strap over your head so that it rests at the nape of your neck.
  4. Pull the bottom of the mask over your mouth and chin.
  
- How to remove a face mask
  1. Clean your hands with soap and water or hand sanitizer before touching the mask. Avoid touching the front of the mask. The front of the mask is contaminated. Only touch the ear loops/ties/band. Follow the instructions below for the type of mask you are using.
    - a. Face Mask with Ear loops: Hold both of the ear loops and gently lift and remove the mask.
    - b. Face Mask with Ties: Untie the bottom bow first then untie the top bow and pull the mask away from you as the ties are loosened.
    - c. Face Mask with Bands: Lift the bottom strap over your head first then pull the top strap over your head.
  2. If using a disposable mask, immediately throw the mask in the trash. For cloth masks, once removed, consider placing in a plastic or paper bag to take home and wash.
  3. Clean your hands with soap and water or hand sanitizer.

To reduce the risk of cross-contamination, gloves are not recommended by the CDC for general use. Unless an employee has a specific medical reason for wearing gloves, they are not recommended for prevention of COVID-19. Gloves as PPE will still be required in locations where they were required prior to COVID-19 and employees should follow all proper guidelines for wearing their protective equipment.

Cleaning and disinfecting schedules will be created at each individual location. The timing, methods, and persons responsible will be assigned by the management at each location. Employees should take all precautions not to ingest or inhale any concentrated disinfectants as they are best used in a well-ventilated area.

### **OSHA Standards**

This COVID-19 Preparedness Response Plan has been prepared under Michigan Executive Order and using OSHA guidance.

The company will continue to follow all OSHA/MIOSHA safety standards and guidelines. While there are no specific standards from OSHA regarding COVID-19, basic regulations such as, General Duty Clause (OSH Act of 1970) which requires employers to furnish to each worker *“employment and a place of employment, which are free from recognized hazards that are causing or are likely to cause death or serious physical harm,”* are still fully in place. In addition, the company continues to follow all standard guidelines for PPE as outlined by our current policies. Continued reporting of workplace injury or illness by OSHA/MIOSHA standards has not changed.

### **Postings and Signage**

HR will supply managers with all required legal documents, including but not limited to: Federal and State Department of Labor posters, Michigan Executive Orders, and local Health Departments Emergency Orders.

Management will be responsible to post all required legal documents, including but not limited to: Federal and State Department of Labor posters, Executive Orders, and Emergency Orders.

HR will supply managers with access to signs (prepared by the CDC, Health Departments, and other reputable agencies) regarding hand sanitation and respiratory etiquette and/or other prevention strategies relevant to the route of infection at the entry of the care center along with the instruction that anyone who is sick must not enter the building.

Management will be responsible for posting signs regarding hand sanitation and respiratory etiquette and/or other prevention strategies relevant to the route of infection at the entry of the care center along with the instruction that anyone who is sick must not enter the building.

Additional information and postings are available at the CDC and local health department websites.

### **Required Training**

All employees will be required to take part in a formal online training module titled, "Safety Protocols Update." This training has been developed with the Michigan Manufacturing Technology Center (MMTC) located in Traverse City, Michigan. The training follows the guidance and protocols of this COVID-19 Preparedness Response Plan.

Additional training at each location will be relayed to employees by a supervisor or manager, and may reflect site-specific (various locations) or industry-specific (retail, food service, or production) policies and procedures.

### **Reporting Concerns:**

All staff and/or customer concerns, related to daily health and safety protocols, should be immediately reported to the manager or supervisor on duty at that location.

For internal concerns, employees are strongly encouraged to follow our open-door policies. Employees whose concerns are related to daily health and safety protocols, are encouraged to report up through the appropriate level of leadership. (Team Captain > Supervisor > Assistant Manager > Manager > General Manager > Director, etc.) In cases when all management levels have been exhausted, employees are encouraged to contact HR.

### **Suppliers and relevant stakeholders**

Leadership in each location should inform incoming suppliers, delivery drivers, and other relevant stakeholders who must enter the building of our COVID-19 policies and procedures related to minimizing exposure risks to staff. If anyone is feeling unwell, they will not be allowed to enter the building(s). All visitors who enter any facility must sign the visitor log.

### **Travel**

All business travel will be prohibited when mandated by Federal, State, or local laws.

When not restricted by law, business travel during the outbreak of COVID-19 will only be permitted for critical business needs and will require approval from a member of the Executive Leadership Team.

Employees who travel for personal reasons, outside of the State of Michigan (domestically or internationally), will be required to report this information to their manager, either during or outside the scope of a daily health screening, and will be subject to CDC and/or Health Department guidelines for self-quarantine.

Any employee who uses public transportation (airplanes, busses, trains, etc.) is highly advised to use their face coverings and hand sanitizer when commuting.

### **Self-Screening**

Employees are expected to report any suspected exposure to COVID-19, while off duty, to their supervisor.

Employees who report an actual or suspected exposure to COVID-19 will be required to quarantine according to local health department orders.

The company reserves the right to prohibit staff from reporting to work when they are sick, until cleared to do so by appropriate medical authorities and in compliance with appropriate labor laws.

### **Environmental Controls**

The company will follow current CDC guidelines for environmental cleaning specific to COVID-19 in addition to routine cleaning for the duration of the threat. Please refer to the environmental controls in the “General Framework” section above.

### **Engineering Controls**

The company will utilize appropriate physical alterations such as use of additional cleaning and/or sanitation stations. No-touch trash containers will be in use whenever possible and trash should be disposed of daily to reduce exposure to contaminants. Please refer to the engineering controls in the “General Framework” section above.

## COVID-19 case within the company

When a **suspected case** of COVID-19 occurs within the company, the following protocol will be enacted:

1. Place on-duty staff who exhibit symptoms of COVID-19 in an isolation room and notify local public health authorities. Please notify HR as well.
2. Under the guidance of public health authorities, arrange a transfer of the suspected infectious person to the appropriate location as directed by public health authorities.
3. Keep the number of staff entering the room in which the isolated person was last working to a minimum until the room can be sanitized according to CDC guidelines.
4. Inquiry will be taken regarding most recent locations and personal interactions for disease traceability purposes, as required by law.

When a **confirmed case** of COVID-19 occurs within the company, the additional protocol will be enacted:

5. Follow steps 1-4 above; HR must be notified.
6. Within 24 hours notify staff who have had “close contact” (working within 6 feet for a prolonged period of time) that a case of COVID-19 has been confirmed. The name of the person(s) testing positive for COVID-19 will remain confidential. Company-wide notification will be sent as soon as possible. Please refer to our template notification letters.
7. Work with local health officials to prevent and limit the spread of the virus. If the case occurs within the Pub, the restaurant will close immediately until a full cleaning can be performed.
8. Continue to affirm the importance of health and safety to our employees.
9. Distribute additional information on COVID-19 symptoms and instructions for employees on what to do if they become symptomatic.
10. Adhere to all protocols and guidelines as set forth in EO 2020-36 and any orders that follow it.

## Employer Considerations

Management will consider its requirements under OSHA, Equal Employment Opportunity Commission (EEOC), American Disabilities Act (ADA) and other state or federal laws in determining the precautions it will take to protect staff and customers. Protecting the employees and other persons shall be of paramount concern.

Management shall take into account:

1. The method of spread of COVID-19 (for example, through contact with bodily fluids, contaminated air, contaminated surfaces)
2. The precautions which can be taken to prevent the spread of the infectious disease as outlined in the plan above, but subject to change at any time
3. The need for employees to take leaves of absence due to a COVID-19 diagnosis, to care for family members with a COVID-19 diagnosis, or stay home with minor children while schools and daycare facilities are closed due to COVID-19 may significantly increase.
4. Other relevant factors

Once these factors are considered, management will weigh its options and determine business decisions, including those in which it reserves the right to restrict sick employees, vendors, or visitors from entering buildings, as well as other decisions as listed in the Business Continuity section above.

## Definitions

**Pandemic** -- A sudden infectious disease outbreak that becomes very widespread and affects a whole region, a continent, or the world due to a susceptible population. By definition, a true pandemic causes a high degree of mortality.

**Isolation** – Separation of an individual or group who is reasonably suspected to be infected with a communicable disease from those who are not infected to prevent the spread of the disease.

**Quarantine** – Separation of an individual or group reasonably suspected to have been exposed to a communicable disease but who is not yet ill (displaying signs and symptoms) from those who have not been so exposed to prevent the spread of the disease.

## Helpful Resources

[Centers for Disease Control and Prevention \(CDC\)](#)  
[State of Michigan Coronavirus Website](#)  
[Benzie-Leelanau District Health Department](#)  
[Grand Traverse County Health Department](#)  
[Health Department of Northwest Michigan](#)  
[Ottawa County Department of Public Health](#)

[Saginaw County Health Department](#)  
[Washtenaw County Health Department](#)  
[OSHA](#)

## Updates and Information

This COVID-19 Preparedness Response Plan has been prepared under Michigan Executive Order and includes guidance from OSHA, the CDC, as well as various local Health Departments from which our stores, offices, and production and warehouse facilities are located.

As updates to Executive Orders, OSHA, the CDC, and/or the Health Departments evolve, we will update this Plan to reflect those changes.

<b>Rev. #</b>	<b>Date, Initials/Title</b>
<b>Revision 1</b>	5/18/2020, NMA, HR Director
<b>Revision 2</b>	5/28/2020, NMA, HR Director