



# SAFETY MANUAL

## PANDEMIC PREPAREDNESS & RESPONSE POLICY

### PURPOSE

Chicago Tube & Iron, (the company\*) has prepared this document to maximize the effectiveness and coordinate our response to pandemic disease events/outbreaks that have the potential to impact the health and wellness of our employees and our operations. The actions outlined in this document are the MINIMUM required actions/activities for each division/location. Divisions/locations may expand on the actions listed in this document.

*\*The company recognizes that pandemic disease events are fluid situations and that any or all the minimum actions outlined in this document may be superseded by public health orders issued by local, county, state or federal governments. Additionally, these actions and our company requirements may need to be modified periodically due to changes in recommendations or guidance from the United States Centers for Disease Control (CDC).*

### DEFINITIONS

**7-Day Moving Average Positivity Rate** – The ratio of positive COVID-19 viral antigen and PCR test results for a given 7-day period divided by the total number of COVID-19 viral antigen and PCR tests given in the same 7-day period. Acceptable data source is the Johns Hopkins University of Medicine, Coronavirus Resource Center.

**Close Contact** – Is currently defined by the U.S. Centers for Disease Control and Prevention (CDC) as being within 2 meters / 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset until the infected person is isolated. For asymptomatic patients, contact tracing includes close contacts between 2 days prior to testing until isolation.

**Contact Surfaces** – Any normal touch point. This includes items like door handles, push buttons, control boxes, levers, steering wheels, gear shifters, light switches, faucet handles, keyboards, mice, desk surfaces, phones, countertops, microwaves, coffee makers, etc.

**COVID-19** – COVID-19 is an abbreviation. ‘CO’ stands for “corona,” ‘VI’ stands for ‘virus,’ ‘D’ stands for ‘disease,’ and ‘19’ refers to 2019 when the viral disease was first identified in December of 2019.

**Coronavirus Family** – The family of coronaviruses has seven members that cause disease in humans: SARS-CoV-1; SARS-CoV-2; MERS or Middle Eastern respiratory syndrome virus; and four different coronaviruses that cause the common cold (i.e., 229E; H15U1; NL63; OC43).

**Epidemic** – An outbreak of disease that spreads quickly and affects many individuals at the same time.

**Fully Vaccinated Employees** – Employees are considered fully vaccinated:

- Two (2) weeks after their second dose in a 2-dose series, like the Pfizer or Moderna vaccines, -OR-
- Two (2) weeks after a single-dose vaccine, like Johnson & Johnson’s Janssen vaccine.

If it has been less than 2 weeks since your shot, or if you still need to get your second dose, you are NOT fully protected. Keep taking all prevention steps until you are fully vaccinated.



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**Large Branch/Location** – For the Company, a large division/location is one where the total headcount is one where the total headcount is  $\geq 100$  full-time employees (total of all buildings).

**Pandemic** – An outbreak of a disease that occurs over a wide geographic area and affects an exceptionally high proportion of the population: a pandemic outbreak of a disease.

**Positive COVID-19 Exposure** – Close contact with a person known to have tested positive for SARS-Cov-2 virus. Does not include positive antibody tests.

**Positivity Rate** – The ratio of positive COVID-19 viral antigen and PCR test results divided by the total number of COVID-19 viral antigen and PCR tests given. Acceptable data source is the Johns Hopkins University of Medicine, Coronavirus Resource Center.

**SARS-CoV-2** – The virus that causes the COVID-19 disease.

**Small Branch/Location** – For the Company, a small division/location is one where the total headcount is one where the total headcount is  $< 100$  full-time employees (total of all buildings).

**Social Distancing** – The practice of maintaining at least 2-meters / 6-feet between persons.

### PANDEMIC PREPAREDNESS

To mitigate risk and exposure to current and future pandemic events, the following supplies will be maintained by each division/location at all times.

Small Divisions/Locations <100 Full-Time Employees, Includes Temporary/Contract Workers	Large Divisions/Locations $\geq 100$ Full-Time Employees, Includes Temporary/Contract Workers
1x – No Touch Forehead Thermometer per Building	1x – No Touch Forehead Thermometer per Building
2x – Cloth Face Coverings or Face Masks per Employee <ul style="list-style-type: none"> <li>N-95 or N-100 particulate respirators may be used in place of cloth face coverings. Maybe delete this section</li> </ul>	2x – Cloth Face Coverings or Face Masks per Employee <ul style="list-style-type: none"> <li>N-95 or N-100 particulate respirators may be used in place of cloth face coverings.</li> </ul>
Disposable paper face masks. Enough for 2-weeks' worth of drivers, contractors and visitors.	Disposable paper face masks. Enough for 2-weeks' worth of drivers, contractors and visitors.
4x – Gallons of USEPA Registered Disinfectants <ul style="list-style-type: none"> <li>See USEPA List N for more information (<a href="https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2">https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2</a>)</li> </ul>	8x – Gallons of USEPA Registered Disinfectants <ul style="list-style-type: none"> <li>See USEPA List N for more information (<a href="https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2">https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2</a>)</li> </ul>
6x – Plastic Spray Bottles	12x – Plastic Spray Bottles



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2x – Gallons (or equivalent) of Hand Sanitizer with a minimum alcohol content of 60%. <ul style="list-style-type: none"> <li>This is can be any combination of size of containers, as long as 2-gallons are maintained. (i.e. 2-gallons or 8-quarts or 16-pints).</li> </ul>	4x – Gallons (or equivalent) of Hand Sanitizer with a minimum alcohol content of 60%. <ul style="list-style-type: none"> <li>This is can be any combination of size of containers, as long as 4-gallons are maintained. (i.e. 4-gallons or 16-quarts or 32-pints).</li> </ul>
An adequate supply of hand soap to last for 3-months.	An adequate supply of hand soap to last for 3-months.
4x – Boxes of Disposable Nitrile Gloves	8x – Boxes of Disposable Nitrile Gloves

- The above list of pandemic preparedness supplies is not meant to be an exhaustive list, but rather a minimum expectation of items that will be needed in response to a pandemic event.
- Supplies should be purchased through regular suppliers or requested through the EHS Manager.
- Please contact VP of Operations or EHS Manager if you are low on supplies.

### RESPONSIBILITIES

All the actions listed below are required during a pandemic event for all the company’s divisions/locations. We recognize that each location is different in size, configuration and needs. General Managers can modify the required actions below to better fit their division/locations specific needs.

1. The Pandemic Response Actions will be EXECUTED at the direction of the Executive Team.
2. The Pandemic Response Actions will be LIFTED at the direction of the Executive Team.
3. The EHS Manager and the VP of Administration will advise the Executive Team on all Pandemic Response Actions.
4. General Managers are responsible for the execution of the required pandemic response actions.
5. General Managers are responsible for creating a Pandemic Response Task Force at each division/location.

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### PROCEDURE

#### HEALTH & TEMPERATURE SCREENINGS

- All Employees, Visitors, Contractors, and Drivers will be required to participate in a health screening **PRIOR** to entering the worksite or the start of work each day. This health screening includes the following:
  - **Temperature Monitoring** – All persons will have their temperature taken when reporting to the division/location each day.
    - Use of a touchless/contactless thermometer to conduct temperature checks of person entering our divisions/locations.



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- The current CDC action level is a fever of  $\geq 100.4$ oF.
- Actual temperature readings (number) should not be recorded. The question should be answered “Yes” or “No” on the form.
- **Pre-Screen Questions** – Employees returning from travel, returning to work after a week or more remote work, or any outside visitor:
  - Ask the person if they have COVID-19 or Flu symptoms. This includes a fever, cough, shortness of breath, sore throat, loss of taste, loss of smell, shaking with chills or diarrhea.
  - Ask the person if they have travelled via airplane internationally in the last 14 days.
  - Ask if the person has had close contact in the last 14 days with an individual diagnosed with COVID-19.
- **If a person’s temperature is above the threshold or any of the “Pre-Screen Questions” are answered affirmatively, the person will be denied access to the division/location.**
  - **For Employees**
    - Advise them to go home and an HR Representative will call them to follow-up within the next few hours. Ask employee what the best phone number is to contact them.
    - General Manager will notify the HR Representative of the affirmative response on the “Pre-Screen Questionnaire or high temperature as soon as practical.
  - **For Visitors, Contractors, and Drivers**
    - The individual will be denied access to the division/workplace and the appropriate person will contact them for next steps.
    - The Chicago Tube & Iron point of contact will also be notified.
    - Drivers may unsecure or secure loads exterior to the building when possible.
    - Drivers wearing face coverings or face masks whenever social distancing cannot be maintained is **STRONGLY RECOMMENDED**. Alternatively, Drivers may remain inside their vehicle at all times when inside the building.
    - Disposable or cloth face masks will be provided to driver on an as needed basis.
    - Every effort should be made to load or unload the common carrier while minimizing the potential risk to our employees and maintaining social distancing.
    - Please see the Chicago Tube & Iron “Pre-Screen Questionnaire” for your for specific questions, as well as the acknowledgement or work requirements.
    - These health screening requirements will be adjusted when required by local, county, state and federal guidance and public health orders.
    - Please see the Chicago Tube & Iron “Pandemic Temperature Screening Procedure” for the complete health and temperature screening process and requirements.
- See **Addendum C** for modifications to the “Health & Temperature Screening” section. **Effective May 17, 2021**, employees are no longer required to participate in the daily health screening by completing the “Pre-Screen Questionnaire”.

### FACE COVERINGS & FACE MASKS

- Wearing face coverings or face masks whenever social distancing cannot be maintained is **STRONGLY RECOMMENDED**.



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- All Divisions/Locations must adhere to the face covering & face mask requirements established by their local, county or state public health authority.
- **Current Effective Date if Stay Order is Lifted: December 06, 2021** – Unvaccinated employees are required to wear a face covering or face mask when indoors and when occupying a vehicle with another person for work purposes, except:
  - When an employee is alone in a room with floor to ceiling walls and a closed door.
  - For a limited time while the employee is eating or drinking at the workplace or for identification purposes in compliance with safety and security requirements.
  - When an employee is wearing an air purifying respirator.
  - See **Addendum D** – Compliance Requirements for OSHA Emergency Temporary Standard (see 29 CFR 1910 Subpart U) for additional face covering / face mask requirements for unvaccinated employees.
- Face coverings must be made with two or more layers of a breathable fabric that is tightly woven (i.e., fabrics that do not let light pass through when held up to a light source).
- Face coverings must be constructed of a solid piece of cloth material without slits, exhalation valves, visible holes, punctures, or other openings.
- Face coverings **MUST** cover the nose, mouth and chin when worn.
- Face coverings must be replaced when wet, soiled, or damaged (e.g., is ripped, has holes, or has broken ear loops).
- Face shields may be worn in addition to face coverings to prevent them from getting wet/soiled.
- Company drivers will be provided with face coverings and required to wear them upon request by a vendor or customer while making pick-ups or deliveries.
- For Common Carrier CMV Drivers, wearing face coverings or face masks whenever social distancing cannot be maintained is **STRONGLY RECOMMENDED**.
- Chicago Tube & Iron will provide face coverings for employees as needed or requested.
- Employees may bring face coverings to work from home.
- Make sure that wearing the face coverings/masks **DOES NOT** introduce additional safety hazards.
  - Face Coverings/Masks should not block or interfere with the employee's vision.
  - The face coverings/masks like the ones shown in instructions from the CDC are preferred.
  - Loose fitting bandanas or cloth strips are not allowed.
- Use of Face Coverings / Face Masks will be discontinued when local heat index values are  $\geq 103^{\circ}\text{F}$ .
  - This supersedes any mandatory wearing of face coverings / face masks required by local, state or federal governments.
- If an employee cannot wear face coverings/masks due to medical reasons, the employee will be required to provide documentation of the medical reason(s) from a licensed health care provider (LHCP).
  - The HR Team will follow-up with the employee and treat these situations as a request for reasonable accommodation under the American Disabilities Act (ADA).
  - Face shields or other alternative protective equipment may be provided to employees that cannot wear face coverings/masks. .
- These face covering requirements may be superseded by local, county, state and federal guidance and public health orders.



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### VISITORS TO COMPANY DIVISIONS/LOCATIONS

- During periods of epidemics or pandemics, no visitors are allowed inside any company locations. This includes visitors, vendor sales representatives and customers. This is both to protect the health and safety of our Chicago Tube & Iron Team Members and the visitors.
- Requests for exceptions to #1 above, should be approved to by the GM.
- All visitors shall be informed that they are required to participate in the company's health and temperature screening process and complete the "Pre-Screen Questionnaire" when entering a division/location.
- All visitors shall be informed if there has been a "Positive COVID-19 Exposure" in the 14-days **PRIOR** to their scheduled visit.
- Visitors should wear face coverings at all times.
- All visitors shall be escorted and shall restrict their movement in the division/location to specific areas of interest.

### CONTRACTORS AND OEM SERVICE PROVIDERS

- We recognize that contractors and Service Providers are an essential part of keeping our operations running safely and efficiently.
- Contractors and Service Providers shall have a designated point of contact at the company division/location that they are performing work.
- All Contractors and Service Providers shall be informed that they are required to participate in the company's health and temperature screening process.
- All Contractors and Service Providers shall complete the "**Pre-Screen Questionnaire**" when to entering a division/location.
- All Contractors and OEM Service Providers shall be informed if there has been a "Positive COVID-19 Exposure" in the 14-days **PRIOR** to their scheduled visit.
- For Contractors and OEM Service Providers, wearing face coverings or face masks whenever social distancing cannot be maintained is **STRONGLY RECOMMENDED**.
- Contractors and Service Providers shall restrict their activities and movement in the division/location to the area(s) where contract or service work is required.

### PARCEL DELIVERIES (USPS, FEDEX, UPS, ETC)

- Divisions/Locations shall establish a designated area for receiving all parcel and post deliveries.
- Parcel and post delivery personnel shall not enter any office, production or warehouse areas other than the designated area.
- If office lobbies are to be used as the designated area for parcel deliveries, a designated location located a minimum of 6ft away from the receptionist will be set up.

### SOCIAL DISTANCING IN THE WORKPLACE

- All employees shall work to maintain social distancing at all times in the workplace. Social distancing requires a minimum of 6-feet of separation between employees.



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- Wearing face coverings or face masks whenever social distancing cannot be maintained is **STRONGLY RECOMMENDED**.
- Telework / Telecommuting – Under certain circumstances, telework/telecommuting may be used as a possible alternative to accommodate social distancing in the workplace and will be reviewed periodically and considered per state and local government updates.
- **Time Keeping: OPTION A (Preferred)** – Employees are allowed to Clock IN and Clock OUT while maintaining proper social distancing at all times.
- **Time Keeping: OPTION B**
  - *Clocking IN* – Employees will not stop at the time clock – they immediately report to their normal workstation.
  - *Clocking OUT* – Employees cannot leave workstations until exact stopping time. This eliminates the issue of everyone waiting in line to clock out and allows plenty of distance between people from different departments heading to the time clock area.
- Immediately stop the use of vending machines, and coffee services to reduce potential employee touch points, this includes food vending and consumable vending. Unplug, and/or cover machines so they can't be used. If a consumable is in a vender machine such as gloves, torch tips, etc. the employee can ask a Supervisor to retrieve what the employee needs to minimize the touch point if needed.
- Lunchrooms, Break Areas & Conference Rooms – For divisions/locations **WITHOUT** a potential or known “**Positive COVID-19 Exposure**”
  - OPTION A – Close lunchrooms, break areas and conference rooms.
  - OPTION B – Continue to use lunchrooms, break areas and conference rooms with the following additional precautions.
    - Determine the maximum occupancy of the area based on the CDC Social Distancing Guidance of 6-feet between all individuals.
      - Post signs stating maximum occupancy requirements at all entrances.
      - Monitor social distancing when the area is in use.
    - Perform cleaning/disinfecting of all contact surfaces every 4-hours.
- Lunchrooms, Break Areas & Conference Rooms – For divisions/locations **WITH** a potential or known “**Positive COVID-19 Exposure**”
  - **MANDATORY** closure of lunchrooms, break areas and conference rooms that positive person may have entered for 14-days following the removal of a positive or known positive COVID-19.
  - Reopening can also occur after areas have been professionally disinfected after exposure.
- Locker Rooms – For divisions/locations **WITHOUT** a potential or known “**Positive COVID-19 Exposure**”
  - OPTION A – Close locker rooms for employees changing in/out of uniform. Employees should take clean uniforms home and arrive to work in uniform each day.
    - If locker rooms also serve as restrooms, the restroom facilities may still be used.
      - Perform cleaning/disinfecting of all contact surfaces at the end of each shift. Additional cleaning/disinfecting may be required.
  - OPTION B – Continue to use locker rooms with the following additional precautions.
    - Determine the maximum occupancy of the area based on the CDC Social Distancing Guidance of 6-feet between all individuals.



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- Post signs stating maximum occupancy requirements at all entrances.
- Monitor social distancing when the area is in use.
- Perform cleaning/disinfecting of all contact surfaces at the end of each shift. Additional cleaning/disinfecting may be required.
- Locker Rooms – For divisions/locations **WITH** a potential or known “**Positive COVID-19 Exposure**”
  - **MANDATORY** closure of locker rooms for 14-days following the removal of a potential positive or known positive COVID-19 Team Member by the HR Team.
    - If locker rooms also serve as restrooms, the restroom facilities may still be used.
      - Perform cleaning/disinfecting of all contact surfaces in the restroom every four (4) hours. Additional cleaning/disinfecting may be required.
    - Reopening can also occur after areas have been professionally disinfected after exposure.
- Wherever possible in production, warehouse and office areas; machinery, workstations, desks and computer terminals shall be moved at least 6-feet apart.
- Use of communal water fountains should be discontinued.
  - Point-of-Use (POU) water coolers can be used, but control buttons need to be cleaned/disinfected after each use.
    - When possible, touchless POU's shall be used.
    - If POU water coolers are used, wipes or spray bottles of disinfectant **MUST** be staged next to the machine and signs posted requiring use.
    - Disposable cups shall be provided.
  - Employees are encouraged to bring whatever water/beverages they will need for their shift from home each day.
- No food trucks are allowed at our plants.
- No Employee should touch another employee (i.e. shake hands, fist bumps, etc.).
- Special precautions will be required for the distribution of Heat Stress Supplies during warmer months.
  - Communal coolers of water or electrolyte replacement fluids should not be used.
  - Single use water or electrolyte replacement fluids will be provided.

### COVID-19 CASE INVESTIGATION PROTOCOLS

- All confirmed and probable COVID-19 cases are investigated by our CTI HR team. It is mandatory that all Plant Managers, General Managers or EVP team members communicate with HR before taking any action.
- CTI Employees are required to report to the company if they have someone in their household that has been diagnosed as positive for COVID-19 or has been in contact for 15 minutes or more during a 24 hours period with someone who has tested positive.
- Getting comprehensive information from an employee diagnosed with COVID-19 is the foundation of case investigation and contact tracing. This information includes:
  - List of close contacts
  - Duration of exposure
  - Exposure locations
  - HR will be in charge of communicating next steps moving forward for the employee. (Self-isolation, number of days away from work, return to work day.)





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- HR will be contacting all employees exposed to a confirmed COVID-19 case.
- HR will follow up on the testing results from the list of close contacts.
- The following statements are taken in consideration based on the updated CDC guidelines:
  - An infected employee can spread COVID-19 starting from 48 hours (or 2 days) before the person has any symptoms or tests positive for SARS-Cov-2, the virus that causes COVID-19.
  - Stay at home, away from others and self-quarantine for 14 days after you were last around someone with COVID-19. The HR team will help identify the dates of your self-quarantine. HR will also provide resources about COVID-19 testing in your area.
    - Self-quarantine means staying home, monitoring your health, and maintaining social distancing (at least 6 feet) from others at all times.
    - If you need to be around other people or animals in or outside of the home, wear a mask. This will help protect the people around you.
    - If you need support or assistance with self-quarantine, then your health department or a local community organization may be able to provide assistance.
    - Self-quarantine helps slow the spread of COVID-19 and can help keep your family, friends, and other people you have been around from possibly getting COVID-19.
- Discussions with HR are confidential. This means that your personal and medical information will be kept private and only shared with those who may need to know, like your health care provider.

### CLEANING/DISINFECTING PROTOCOLS

- Each division shall establish a written cleaning/disinfecting schedule for all common areas, office areas and workstations. Time for cleaning/disinfecting shall be built into the normal work schedule for each employee. The table below states the minimum cleaning frequency for each area/item:

Areas or Items To be Cleaned/Disinfected	Minimum Cleaning/Disinfecting Frequency
Lobby / Reception Area	1x/Day – All contact surfaces
Lunchrooms & Break Areas	Every four Hours – All contact surfaces
Locker Rooms	1x/Shift – All contact surfaces used during the shift at the end of the shift.
Conference Rooms	1x/Day – All contact surfaces
Personal Office Spaces (Offices and Cubicles)	1x/Day – All contact surfaces
Cranes, Lifting & Rigging Equipment	1x/Shift – All contact surfaces used during the shift at the end of the shift.
Powered Industrial Trucks (Forklifts)	1x/Shift – All contact surfaces used during the shift at the end of the shift.
Machine Control Panels	1x/Shift – All contact surfaces used during the shift at the end of the shift.
Machine Workstations	1x/Shift – All contact surfaces used during the shift at the end of the shift.
Supervisor / Leadman Workstations or Kiosks	1x/Shift – All contact surfaces used during the shift at the end of the shift.
Shipping / Receiving Workstations or Kiosks, includes overhead door controls	1x/Shift – All contact surfaces used during the shift at the end of the shift.
Maintenance Areas/Cribs	1x/Shift – All contact surfaces used during the shift at the end of the shift.
Shared equipment (i.e. forklifts, crane controls)	After each use.

- Employees shall be given adequate time and resources to frequently wash their hands.
- Shared equipment (i.e. forklifts, crane controls) will require an increased frequency of cleaning/disinfecting. **These items should be cleaned after each use.**
- Routine cleaning/disinfecting work may be performed by company employees or 3rd party contractors.



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- Each division shall use USEPA Registered Disinfectants (List N) for cleaning or disinfecting (see <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2> for more information).
  - Most chemicals used for cleaning/disinfecting require **30-60 seconds of contact time** to adequately kill viruses.
  - The division **MUST** obtain a Safety Data Sheet (SDS) for every chemical used for cleaning/disinfecting whether the work is performed by employees or a 3rd party contractor.
  - Other cleaning/disinfecting chemicals may be approved by the EHS Manager.
- **Heightened Disinfection Protocols (not routine cleaning)** - If a division/location has a potential or known **“Positive COVID-19 Exposure”** in the workplace, that division shall perform additional disinfection as outlined below:
  - Aerosol/Fogging disinfecting using hydrogen peroxide or chloride chemicals should only be done by 3rd party contractors.
  - Use of these services should be reserved to mitigate potential or known **“Positive COVID-19 Exposures”** in the workplace and not as routine cleaning/disinfecting.
  - Aerosol/Fogging disinfection should be performed as soon as possible following the removal of a potentially positive COVID-19 Team Member by the HR Team.
  - **If more than three (3) days have passed since the person who is potentially positive for COVID-19 visited or used the facility, Aerosol/Fogging disinfection is not necessary.**
  - Company employees may not be in areas where aerosol/fogging is being performed until after the chemicals have dried on all surfaces.
  - Food or beverages that are left out in the open during the aerosol/fogging disinfection process should be disposed of.
  - Dishes, kitchenware, coffee pots, etc. should be cleaned with soap and water prior to re-use after aerosol/fogging disinfection.

### BUSINESS & PERSONAL TRAVEL POLICY

- During pandemic events, all business international and domestic travel will be suspended.
- For unvaccinated employees, please see **ADDENDUM B – COVID-19 Guidance For RETURN-TO-WORK and SELF-QUARANTINE**; Section 1.0 – Guidance for Different Scenarios; Scenario #6 “High Risk Travel” for return-to-work travel guidance.
- For fully vaccinated employees, please see **ADDENDUM B – COVID-19 Guidance For RETURN-TO-WORK and SELF-QUARANTINE**; Section 2.0 – Guidance for Fully Vaccinated Employees; #3 “Fully vaccinated employees with no COVID-like symptoms following domestic or international travel” for return-to-work travel guidance.
- Localized epidemic events may have similar travel restrictions.

### BUSINESS CONFERENCES AND/OR EVENTS

- During pandemic events, attendance at external business conferences, tradeshows, seminars and related forums will be suspended.
- Localized epidemic events may have similar attendance restrictions.



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### TELECONFERENCE & COMMUNICATION OPTIONS

The following is an overview of our available teleconferencing solutions. Please note important considerations for each option and use the right tool for the given need to avoid over-loading our systems.

#### Teleconferencing Options:

- VOICE ONLY
  - If you're not presenting visual information, use this option.
- PERSON-TO-PERSON SCREEN SHARING
  - If you need to share a screen between two (2) Chicago Tube & Iron participants, use Zoom to share your screen and speak over your desk/conference/cell phone.
- MULTI-PARTICIPANT SCREEN SHARING
  - Use Zoom ONLY if you need to share a screen between three (3) or more individuals, host a voice conference call with seven (7) or more dial in devices or require WebEx specific functionality.
- **NOTE:** We do not have a limit for Zoom participants.

### ADDITIONAL QUESTIONS OR SUPPORT

If you should have any questions or need additional support, please contact the Safety Leader for your division/location or one of the individuals listed below.

<p><b>Nicole Dorner</b> EHS Manager</p>	<p>Email: <a href="mailto:ndorner@chicagotube.com">ndorner@chicagotube.com</a> Direct Line: (815) 834-8529 Cell: (331) 212-0490</p>
<p><b>Janeth Villalobos</b> Vice President – Administration</p>	<p>Email: <a href="mailto:jvillalobos@chicagotube.com">jvillalobos@chicagotube.com</a> Direct Line: (815) 834-8503 Cell: (630) 441-6843</p>

### INTERNET REFERENCES

- CTI Intranet Page for COVID-19 Resources  
<https://chicagotube.myhubintranet.com/Managers/Covid-19-Info-Managers>
- World Health Organization COVID-19 Web Site  
<https://www.who.int/emergencies/diseases/novel-coronavirus-2019>
- US Centers for Disease Control & Prevention (CDC) COVID-19 Web Site  
<https://www.cdc.gov/coronavirus/2019-nCoV/index.html>
- US Government Coronavirus Web Site  
<https://www.coronavirus.gov/>
- US White House Opening Up America Again  
<https://www.whitehouse.gov/openingamerica/>
- State of Illinois  
<http://dph.illinois.gov/covid19>



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- State of Indiana  
<https://www.coronavirus.in.gov/>
- State of Iowa  
<https://coronavirus.iowa.gov/>
- State of Minnesota  
<https://www.health.state.mn.us/diseases/coronavirus/index.html>
- State of North Carolina  
<https://www.ncdhhs.gov/divisions/public-health/covid19>
- State of Ohio  
<https://coronavirus.ohio.gov/wps/portal/gov/covid-19/home>
- State of Georgia  
<https://dph.georgia.gov/>
- State of Wisconsin  
<https://www.dhs.wisconsin.gov/covid-19/index.htm>
- Johns Hopkins University of Medicine – Coronavirus Resource Center  
<https://coronavirus.jhu.edu/us-map>
- CNN Health – Tracking COVID-19 Cases in the US  
<https://www.cnn.com/interactive/2020/health/coronavirus-us-maps-and-cases/>



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### ADDENDUM A – COVID-19 CONTACT TRACING GUIDANCE<sup>1</sup>

#### OVERVIEW

Contact tracing is the process of identifying and alerting people who have come into “close contact” with a person known to be infected with COVID-19. This is a key strategy for preventing further spread of the SARS-CoV-2 virus and COVID-19.

**Close Contact** - Is currently defined by the U.S. Centers for Disease Control and Prevention (CDC) as being within 2-meters / 6-feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset until the infected person is isolated. For asymptomatic patients, contact tracing includes close contacts between 2 days prior to testing until isolation.

#### CORE PRINCIPLES

- Contact tracing is part of the process of trying to limit the spread when there is a confirmed infection.
- In contact tracing, the HR Team will work with the individual who has tested positive, or is suspected of, COVID-19 in a confidential manner to help them recall everyone with whom he or she had close contact (as defined above) during the timeframe the individual may have been infectious and not in isolation.
- The HR Team will advise close contacts (as defined above) of their potential exposure as rapidly and sensitively as possible.
- To protect privacy, close contacts are informed only that they may have been exposed to someone with the infection. They are not told the identity of the individual who may have exposed them.
- Close contacts should be directed to the CDC for COVID-19 educational information and support to understand their risk, what they should do to separate themselves from others who are not exposed, how to monitor themselves for illness, and the possibility that they could spread the infection to others even if they themselves do not feel ill.
  - Please direct employees to <https://www.cdc.gov/coronavirus/2019-nCoV/index.html> for more information.
- To the extent possible, the HR Team should check in with close contacts to make sure they are self-monitoring and have not developed COVID-19 symptoms. Contacts who develop symptoms should promptly be referred to their Primary Care Provider (PCP) for evaluation and medical care.

#### INVESTIGATION

- Contact tracing is implemented when an individual experiences 15 minutes of exposure over a 24-hour period. This could occur in a single interaction or individual exposures added together e.g., three 5-minute exposures for a total of 15 minutes.
- Factors to consider when defining close contact include:
  - Proximity - closer distance likely increases exposure risk.
  - Duration of exposure. Longer exposure time likely increases exposure risk.
  - Whether the infected individual has symptoms. The period around onset of symptoms is associated with the highest levels of viral shedding.



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- If the infected person was likely to generate respiratory aerosols (e.g., was coughing, singing, shouting).
- Other environmental factors such as crowding, adequacy of ventilation, whether exposure was indoors or outdoors.
- **Close contact should generally be evaluated IRRESPECTIVE of whether the contact was wearing mask/face covering.**
- The following information should be collected from the individual who has tested positive, or is suspected of, COVID-19 (when conducting contact tracing, starting from 2 days before illness onset until the infected person is isolated):
  - Supervisor name, department, shift, work location/duties
  - What COVID-19 symptoms are present?
  - What date did the symptoms start?
  - Was there transportation/carpool with work colleagues?
  - Was there lunch/break with work colleagues?
  - Whom do they work closely with?
  - What work tasks do they normally perform with colleagues identified as “close contacts”?
  - Any work colleagues who are family or close friends?
  - Do they wear a mask when required?
- **Results of contact tracing should be reviewed with leadership at the division PRIOR to contacting the impacted employees.**

<sup>1</sup>Guidance adapted from U.S. Centers for Disease Control (CDC) guidelines.



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### **ADDENDUM B – COVID-19 GUIDANCE FOR RETURN-TO-WORK AND SELF- QUARANTINE** <sup>1,2,3</sup>

#### **SECTION 1.0 - GUIDANCE FOR DIFFERENT SCENARIOS**

##### **1. Employee with Positive COVID-19 Test (symptomatic employees)**

- Symptomatic employee may return to work 5 days after:
  - i. Symptoms first appeared **-AND-**
  - ii. 24-hours with no fever without the use of fever-reducing medications **-AND-**
  - iii. All other symptoms\* have improved (ex. cough, shortness of breath, etc.).  
*\*Loss of taste and smell may persist for weeks or months after recovery and need not delay the end of the isolation period.*
  - iv. If the Symptomatic Employee has not improved, they may take up to five (5) additional days to recover from COVID-19 without seeing a Primary Care Provider (PCP).
  - v. The Symptomatic Employee **MUST** wear a face mask in all indoor settings for an additional 5 days after returning to work.
- Documentation of positive test result is required by the HR Team immediately upon receipt of test result by employee.
- No Primary Care Provider (PCP) documentation is required prior to returning to work if absence is ≤10 days. If absence is >10 days, PCP documentation is required to return to work.

##### **2. Employee with Positive Test (asymptomatic)**

- An asymptomatic employee may return to work 5 days after:
  - i. Positive test **-AND-**
  - ii. If NO SYMPTOMS have presented during the entire 5 days.
  - iii. The Asymptomatic Employee **MUST** wear a face mask in all indoor settings for an additional 5 days after returning to work.
- Documentation of positive test result is required by the HR Team immediately upon receipt of test result by employee.
- No Primary Care Provider (PCP) documentation is required prior to returning to work.

##### **3. Employee Experiencing COVID-19 Type Symptoms**

- Employee stays home.
- Employee must contact Primary Care Provider (PCP) for guidance.
- If the PCP recommends testing and the employee tests positive for COVID-19, go to #1 above.
- Employee must provide documentation from PCP (and the test result if testing was performed) to the HR Team prior to returning to work.

##### **4. Employee Identified as Close Contact or Employee Lives in the Same Household with One or More Positive COVID-19 Persons.\***

- The employee that was identified as a close contact with positive COVID-19 case or persons in the same household, must quarantine for 5 days after the date of exposure to the person(s) who was COVID-19 positive.
- The employee **MUST** wear a face mask in all indoor settings for an additional 5 days after returning to work.
- If the employee becomes symptomatic for COVID-19 during or after self-quarantine, go to Scenario #3 above.



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- No documentation from Primary Care Provider (PCP) is required prior to returning to work.
- The local public health authorities make the final decisions about how long quarantine should last, based on local conditions and needs. The Company will follow the recommendations of local public health departments.
- See **Section 2.0, #2 below** for exemptions from quarantine for fully vaccinated employees.

**Exception to Scenario #4** - Anyone who has had close contact with someone with COVID-19 and who meets the following criteria **DOES NOT** need to quarantine.

- Has had COVID-19 illness within the previous 3 months **-AND-**
- Has recovered **-AND-**
- Remains without COVID-19 symptoms (for example, cough, shortness of breath).
- If unvaccinated, the Close Contact Employee **MUST** wear a face mask in all indoor settings for 10 days.

### 5. High Risk Travel

- If an employee travels internationally to a CDC Level 3 (High Risk) or CDC Level 4 (Very High Risk) country, they must quarantine for 14 days from the date of their return home.
  - i. See <https://www.cdc.gov/coronavirus/2019-ncov/travelers/map-andtravel-notice.html> for more information.
- If an employee travels to a State that is restricted or flagged as high risk by their home State, they must quarantine for 14 days from the date of their return home.
- No documentation from Primary Care Provider (PCP) is required before returning to work.
- See **Section 2.0, #3 below** for exemptions from quarantine for fully vaccinated employees.

## SECTION 2.0 - GUIDANCE FOR FULLY VACCINATED EMPLOYEES

This section contains policy guidance for employees that have been fully vaccinated.

1. The term “**Fully Vaccinated**” is currently defined by the CDC as follows:

**Fully Vaccinated Employees** – Employees are considered fully vaccinated:

- Two (2) weeks after their second dose in a 2-dose CDC approved COVID-19 vaccine series, like the Pfizer or Moderna vaccines, **-OR-**
- Two (2) weeks after a single-dose of a CDC approved COVID-19 vaccine, like Johnson & Johnson’s Janssen vaccine.

If it has been less than 2 weeks since your shot, or if you still need to get your second dose, **you are NOT fully protected (not fully vaccinated)**. Keep taking all prevention steps until you are fully vaccinated.

2. **Employees “Within 6-Months of Becoming Fully Vaccinated” or Employees That Have “Received One COVID-19 Vaccine Booster Dose after being Fully Vaccinated” with no COVID-like symptoms following an exposure\*\***
  - Employees meeting the vaccination criteria above with no COVID-19 symptoms **do not need to quarantine for Scenarios #4 in Section 1.0 above.**





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- i. Quarantine is not required.
  - ii. The fully vaccinated employee should get tested 5 days after exposure to someone with suspected or confirmed COVID-19.
  - iii. The fully vaccinated employee **MUST** wear a mask in indoor settings for 10 days after exposure.
    1. Wearing a face mask in all indoor settings is required for 10 days or until they receive a negative test result.
  - iv. Documentation of positive or negative test results is required by the HR Team immediately upon receipt of test result by employee.
- The employee must provide documentation of full vaccination to the HR Team. A copy of the CDC Vaccination Card is the preferred method of documentation.
  - Fully vaccinated employees who do not quarantine should still self-monitor for symptoms of COVID-19 for 14 days following an exposure.
  - If COVID-19 symptoms develop after an exposure, the fully vaccinated employee with symptoms should stay home, contact their PCP for guidance and follow the policy guidance for **Scenario #3 in Section 1.0 above**.

**\*\*If it has been longer than 6 months since becoming fully vaccinated and the employee has not received one COVID-19 vaccine booster dose, the exemptions in #2 above DO NOT APPLY. Please follow the guidance for Scenarios #4 in Section 1.0 and treat as an unvaccinated employee.**

### 3. Fully vaccinated employees with no COVID-like symptoms following domestic or international travel

- Fully vaccinated employees do not need to self-quarantine following domestic travel.
- Fully vaccinated employees do not need to self-quarantine in the United States following international travel.
- Both points above apply to business and personal travel.
- For **Scenario #6 in Section 1.0 above**, if the affected employee is fully vaccinated, quarantine is not required.
- The employee must provide documentation of full vaccination to the HR Team. A copy of the CDC Vaccination Card is the preferred method of documentation.
- If COVID-19 symptoms develop after domestic or international travel, the fully vaccinated employee with symptoms should stay home, contact their PCP for guidance and follow the policy guidance for **Scenario #3 in Section 1.0 above**.

### 4. Fully vaccinated people with COVID-19 symptoms

- Although the risk that fully vaccinated people could become infected with COVID19 is low, any fully vaccinated employee who experiences symptoms consistent with COVID-19 should isolate themselves from others.
- The fully vaccinated employee with symptoms should stay home, contact their PCP for guidance and follow the policy guidance for **Scenario #3 in Section 1.0 above**.

<sup>1</sup>Olympic Steel reserves the right to modify or change these policies and procedures at any time based on the changing guidance from the CDC or other government agencies.

<sup>2</sup>Guidance adapted from U.S. Centers for Disease Control (CDC) guidelines.



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<sup>3</sup>Essential Critical Infrastructure Workers – Per the Cybersecurity & Infrastructure Security Agency (CISA), Olympic Steel, Inc. (OSI) qualifies as an essential business operating under the “Critical Manufacturing Sector”. The cessation of operation of one or more of our facilities DOES NOT cause serious harm or danger to public health or safety. As such, we are not exempt from the self-quarantine requirements for essential critical infrastructure workers who are not symptomatic.



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### **ADDENDUM C – LESSENING OF CERTAIN PANDEMIC RESTRICTIONS BASED ON CDC AND STATE GUIDANCE\***

- 1. Discontinuation of Use of Pre-Screen Questionnaire for Employees – Effective May 17, 2021**
  - Effective May 17, 2021, employees are no longer required to complete the “PreScreen Questionnaire” prior to entering the worksite or the start of work each day.
  - Company employees are still required to monitor themselves for COVID-19 or Flu symptoms. This includes a fever, cough, shortness of breath, sore throat, loss of taste, loss of smell, shaking with chills or diarrhea.
  - Employees are asked to stay home when sick. Contact your supervisor and your Regional HR Manager for next steps.
  - The Pre-Screen Questionnaire **MUST** still be used for all Visitors, Contractors and OEM Service Providers. Please see the “Health & Temperature Screenings” section of this policy for more information (starts on Page 3).
  - Completed forms shall be retained by each division until further notice.
- 2. Changes to Face Coverings (Face Masks) Requirements – Effective Date Varies by State**
  - **Section Removed** – Please see Section on “Face Coverings (Face Masks)” starting on Page 4 above.
- 3. Vending Services (i.e. Food, Coffee Services & Consumables) – Effective June 1, 2021**
  - Use of vending machines, coffee services and consumable vending (i.e. Grainger and Fastenal) can resume.
- 4. Food Trucks – Effective June 1, 2021**
  - Allowing food trucks on our property for employee meal purchases can resume.
  - Food truck workers **MUST** complete the Pre-Screen Questionnaire PRIOR to serving food each day/shift.
- 5. Business Travel Updates – Effective May 17, 2021**
  - **Section Removed** – Please see Section on “Business & Personal Travel Policy” starting on Page 10 above.

*\*The Company recognizes that pandemic disease events are fluid situations and that any or all the minimum actions outlined in this document may be superseded by more restrictive public health orders issued by local, county, state or federal governments. Additionally, these actions and our company requirements may need to be modified periodically due to changes in recommendations or guidance from the United States Centers for Disease Control (CDC) or the Occupational Safety & Health Administration (OSHA).*



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### **ADDENDUM D – COMPLIANCE REQUIREMENTS FOR OSHA EMERGENCY TEMPORARY STANDARD (SEE 29 CFR 1910 SUBPART U)\***

The purpose of this section of the Pandemic Preparedness & Response Policy is to outline the company's policies and procedures for mandatory vaccination, weekly testing and face coverings as required by the OSHA COVID-19 Emergency Temporary Standard (ETS) on Vaccination, Testing and Face Coverings (29 CFR 1910.501 et. al.). **All employees are required to be fully vaccinated or provide weekly COVID-19 test results and wear face coverings as outlined below.**

#### **EMPLOYEES CHOOSING COVID-19 VACCINATION – **CURRENT EFFECTIVE DATE: JANUARY 10, 2022****

Employees choosing to be fully vaccinated, must meet the definition for "Fully Vaccinated Employees" as stated below:

**Fully Vaccinated Employees** – Employees are considered fully vaccinated:

- Two (2) weeks after their second dose in a 2-dose CDC approved COVID-19 vaccine series, like the Pfizer or Moderna vaccines, -OR-
- Two (2) weeks after a single-dose of a CDC approved COVID-19 vaccine, like Johnson & Johnson's Janssen vaccine.

If it has been less than 2 weeks since your shot, or if you still need to get your second dose, **you are NOT fully protected (not fully vaccinated)**. Keep taking all prevention steps until you are fully vaccinated.

#### **PROOF OF VACCINATION STATUS**

- All employees are now required by law, as a condition of employment with Olympic Steel, to report their vaccination status and, if vaccinated, provide proof of vaccination status. Failure to comply with this requirement will result in disciplinary action.
- Acceptable proof of vaccination status includes any of the following:
  - The record of immunization from a health care provider or pharmacy;
  - A copy of the COVID-19 Vaccination Record Card;
  - A copy of medical records documenting the vaccination;
  - A copy of immunization records from a public health, state, or tribal immunization information system; or
  - A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine(s).
- In instances where an employee is unable to produce acceptable proof of vaccination under the above section, the employee may provide a signed and dated statement attesting to the following:
  - The employee's vaccination status (fully vaccinated or partially vaccinated);
  - The type (brand) of vaccine administered;
  - The date(s) of administration;
  - The name of the health care professional(s) or clinic site(s) administering the vaccine; and



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- A statement from the employee certifying the following:
  - **I have attempted to produce a copy of my CDC COVID-19 Vaccination Record Card or one of the other forms of acceptable medical records documenting my proof of vaccination status for COVID-19 and I am unable to do so.**
  - **The information and statements herein about my vaccination status are true and accurate. I understand that knowingly providing false information regarding my vaccination status on this form may subject me to criminal penalties and termination of employment.**
- The form titled “Employee Certification of Receiving COVID-19 Vaccine” **MUST** be used for attestation by vaccinated employees that cannot produce acceptable proof of vaccination under #2 above.
- Employees who choose not to provide acceptable proof of vaccination or a signed and dated employee attestation statement will be considered unvaccinated and be required to submit weekly COVID-19 tests and wear face coverings as outlined below.
- Any employee who submits falsified COVID-19 vaccination records or statements will be terminated from employment.
- Copies of employee vaccination records will be treated as confidential employee medical records and maintained in a confidential manner in compliance with “29 CFR 1910.1020 - Access to employee exposure and medical records”. Access to employee medical records shall be restricted.
- Acceptable proof of vaccination will be collected by the local HR Team Member or Safety Representative.
  - For new hires, acceptable proof of vaccination will be collected by the person performing the employee’s onboarding.

### TIME FOR VACCINATION

The decision to get vaccinated is the employee’s to make. However, if an employee chooses to get vaccinated, the Company will support the employee’s choice as follows:

- An employee will be given up to four (4) hours of paid time per vaccination dose to travel to the vaccination site, receive a COVID-19 vaccination, and return to work.
- A maximum of eight (8) hours of paid time will be granted for employees receiving two doses of COVID-19 vaccine (e.g., Pfizer or Moderna vaccines).
- Employees who take longer than four (4) hours to get the vaccine must notify their Supervisor with the reason for the additional time (e.g., if they need to travel long distances to get the vaccine). Any additional time requested will be granted, if reasonable, but will not be paid. The employee can elect to use accrued leave, e.g., sick leave, to cover the additional unpaid time.
- If an employee is vaccinated outside of their regularly scheduled work hours, they will not be compensated.

### TIME FOR RECOVERY

- If an employee experiences an adverse health effect or side-effect from being vaccinated for COVID-19, the employee may utilize sick leave immediately following each dose if the side effects prevent the employee from working.



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- Employees experiencing side-effects from a COVID-19 vaccination dose that prevents them from working will be required to use up to two (2) days of their accrued paid sick leave for such time off work.
- Where an employee is unable to work due to side effects immediately following vaccination but has exhausted their accrued paid sick leave, they will be provided up to two (2) additional days of paid sick leave for the sole purpose of recovery from side effects immediately following their vaccination dose.
- If an employee experiences the adverse health effect or side-effect for more than 2-days, the employee should contact their PCP for direction/support and to obtain an excuse from work document.
- Employees will not accrue points under the Company's attendance policy for any time needed for recovery.

### EMPLOYEES CHOOSING WEEKLY TESTING & WEARING OF FACE COVERINGS

Employees that choose to remain unvaccinated, refuse to provide acceptable proof of vaccination or are not yet fully vaccinated **will be considered unvaccinated** and be required to submit weekly COVID-19 tests and must also wear face coverings as outlined below.

### WEEKLY COVID-19 (SARS-CoV-2) TESTING – **CURRENT EFFECTIVE DATE: FEBRUARY 9, 2022**

- For unvaccinated employees:
  - COVID-19 testing will be required at least once every seven (7) days as a condition of continued employment (as required by applicable law);
  - Documentation of the most recent COVID-19 test must be provided to the local HR Team Member or Safety Representative no later than the seventh (7th) day following the date on which the employee last provided a COVID-19 test result.
- A viral antigen or PCR test for the COVID-19 virus will be required weekly from each employee that is not fully vaccinated.
- COVID-19 “at Home” Viral Antigen Test Kits
  - If using a viral antigen at home test kits, that test **MUST** be observed through telemedicine by a licensed healthcare provider or proctor. The telemedicine provider/proctor **MUST** provide documentation as to the results of the test.
- **Each branch shall determine which day of the week works best for their production schedule for employees to turn in weekly test results.**
  - For ease of tracking, we recommend that all employees in the weekly testing program turn in the tests on the same day.
    - For example, weekly test results could be turned in to the local HR Team Member or Safety Representative on or before the beginning of the regularly scheduled shift on Wednesday of each week.
  - Test results are only valid for a 7-day period.
- We **STRONGLY** recommend that employees needing weekly tests get tested on the **1<sup>st</sup> day of the testing period** each week so that the results are available by the next due date.
- Employees with negative COVID-19 test results will be allowed to work up to the next required testing period.



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- Any employee with a positive COVID-19 test result is not permitted to enter the workplace or, if already at work, must immediately exit the premises and go home. The employee will be contacted by the designated HR Team member with additional instructions (see **ADDENDUM B** – COVID-19 Guidance for RETURN-TO-WORK and SELF-QUARANTINE for more information).
- Employees with a positive COVID-19 test result or positive COVID-19 diagnosis from a licensed healthcare practitioner (LHCP) or primary healthcare provider (PCP) are not required to provide a weekly COVID-19 test result for **90-days** following the date of their positive test or diagnosis.
- As weekly testing is an employee choice, the Company will not pay for any time required for the employee to get tested. Employee testing activities are “off the clock”.
- The Company will not reimburse employees for the costs of weekly testing.
  - COVID-19 testing is currently provided at “no cost” through the Company’s group medical insurance and/or the national COVID-19 testing program.
- Employees failing to provide a weekly COVID-19 test will not be eligible to work and shall be subject to the company’s attendance policy.
- Any employee who submits falsified COVID-19 test results will be terminated from employment.
- Copies of weekly COVID-19 test will be treated as confidential employee medical records and maintained in a confidential manner in compliance with “29 CFR 1910.1020 - Access to employee exposure and medical records”. Access to employee medical records shall be restricted.

### **WEARING OF FACE COVERINGS / FACE MASKS FOR UNVACCINATED EMPLOYEES – CURRENT EFFECTIVE DATE: JANUARY 10, 2022**

- Each employee who is unvaccinated is required to wear a face covering or face mask when indoors and when occupying a vehicle with another person for work purposes, **except**:
  - When an employee is alone in a room with floor to ceiling walls and a closed door.
  - For a limited time while the employee is eating or drinking at the workplace or for identification purposes in compliance with safety and security requirements.
  - When an employee is wearing an air purifying respirator.
  - Where the Company has determined that the use of face coverings is infeasible or creates a greater hazard that would excuse compliance with this paragraph (e.g., when it is important to see the employee’s mouth for reasons related to their job duties, when the work requires the use of the employee’s uncovered mouth, or when the use of a face covering presents a risk of serious injury or death to the employee).
- Any face covering or face mask required to be worn by this section **SHALL** be:
  - Worn to fully cover the employee’s nose and mouth; and
  - Replaced when wet, soiled, or damaged (e.g., is ripped, has holes, or has broken ear loops).
- The Company will not prevent any employee from voluntarily wearing a face covering or facemask unless the employer can demonstrate that doing so would create a hazard of serious injury or death, such as interfering with the safe operation of equipment.
- The Company will permit the employee to wear a respirator instead of a face covering whether required or not.
  - If an employee chooses to wear an N-95, N-100, P-95 or P-100 particulate filtering respirator, they will be subject to the requirements in the Company’s respiratory protection program and



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will be given a copy of 29 CFR 1910.134 Appendix D (Mandatory) Information for Employees Using Respirators When Not Required Under Standard.

- We will not prohibit Visitors, Customers, Contractors, OEM Service Providers or CMV Drivers from wearing face coverings or face masks.
- Please see the section titled “Face Coverings (Face Masks)” in the primary section of this policy for more information and requirements around face coverings and face masks.

### INFORMATION PROVIDED TO EMPLOYEES – **CURRENT EFFECTIVE DATE: JANUARY 10, 2022**

- The Company will provide a copy of the following information to all employees as required in 29 CFR 1910.501(j) et.al.
  - Olympic Steel’s “Pandemic Preparedness & Response Policy **ADDENDUM D** – Compliance Requirements for OSHA Emergency Temporary Standard (see 29 CFR 1910 Subpart U)”
  - OSHA Publication FS-4161: OSHA Fact Sheet – COVID-19 Vaccination and Testing ETS
  - CDC Webpage – Key Things to Know About COVID-19 Vaccines.
  - OSHA Publication FS-4159: OSHA Fact Sheet - Workers’ Rights under the COVID-19 Vaccination and Testing ETS
  - OSHA Publication FS-4157: OSHA Fact Sheet - Information for Employees on Penalties for False Statements and Records
- The Company will provide this information in a language that our employees understand.
- The Company will obtain written confirmation that each employee has received the information listed hereunder.
- For newly hired employees, the Company will provide this information during the employee onboarding process.

### REPORTING OF COVID-19 FATALITIES AND HOSPITALIZATIONS TO OSHA

The Company will report COVID-19 fatalities and hospitalizations to OSHA as required under 29 CFR 1910.501(k) and 29 CFR 1904.39.

### RECORDKEEPING – **EFFECTIVE DATE: JANUARY 10, 2022**

The Company will retain records related to the OSHA ETS until the ETS expires. The Company will make records available as required and outlined in 29 CFR 1910.501(l).

### REQUESTS FOR ACCOMMODATIONS UNDER THE AMERICANS WITH DISABILITIES ACT (ADA)

Employees may request a reasonable accommodation if they cannot wear a face covering (as otherwise required by this policy) because of a disability, or if the provisions in this policy for testing for COVID-19 conflict with a sincerely held religious belief, practice, or observance.

Requests for exceptions and reasonable accommodations must be initiated by contacting your Human Resources Representative and completing a Request for Accommodation Form. All such requests will be





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handled in accordance with applicable laws, regulations and the reasonable accommodation policies set forth in the Company's Employee Handbook.

*\*The Company recognizes that pandemic disease events are fluid situations and that any or all the minimum actions outlined in this document may be superseded by more restrictive public health orders issued by local, county, state or federal governments. Additionally, these actions and our company requirements may need to be modified periodically due to changes in recommendations or guidance from the United States Centers for Disease Control (CDC) or the Occupational Safety & Health Administration (OSHA).*