



SAFETY MANUAL

PANDEMIC PREPAREDNESS & RESPONSE POLICY

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 **1st 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).*