

April 17<sup>th</sup>, 2020

All Spartan Personnel & Contractors

FROM:

TO:

R. Aaron Shifflet, HSE Director Tyrel Porter, Regional HSE Manager

DATE:

April 17th 2020

SUBJECT:

COVID-19 RESPONSE PLAN (R.3)



# **Executive Summary**

At Spartan, we have always preached that Safety is our Top Priority. Now more than ever it is incumbent upon us to not only continue to live that aspiration, but to ensure that it remains top of mind. It is fitting during this time to reflect on our Core Values as an organization, as well as our Leadership Code.

At Spartan we live by the three Core Values of Accountability, Gratitude, and the Extra 2%.

#### Accountability

It is critical during this time that each and every employee hold themselves and others appropriately accountable. Accountable for the work they do and accountable for the way they are feeling, both physically and emotionally. If anyone is feeling unwell, it is expected that you would let your supervisors and/or HSE know immediately. Further, if you are feeling unwell, it is expected that you will follow the guidelines outlined in this document.

#### Gratitude

It is important during this time that we continue to express gratitude for our employees. Many of them are experiencing greater loads of stress both at work and at home. Sincere gratitude for those that we are privileged to work with can go a long way to relieve stress, worry and concern.

#### Extra 2%

While we pride ourselves on being hard working and going above and beyond, a focused extra 2% on the guidelines outlined in this document will give us the best chance at keeping our employees and their families safe from harm.

It is important for us to remember the principles of our Leadership Code including Service, Humility, Accountability, Responsiveness, Attitude, & Teamwork.

We urge you to take all precautions and remain extra vigilant during this difficult time. Please know that you are all appreciated and that we will continue to do all that we can to support you.

Sincerely,

Spartan Ownership



# 1.0 Introduction

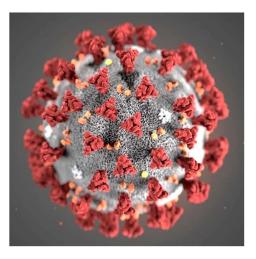
Spartan Companies places the health and safety of our employees and our subcontractors as our top priority. We recognize that our response to the current events surrounding the COVID-19 pandemic can play a massive role in the health and wellbeing of our employees, our clients, and their families. As such, Spartan has initiated this plan across our business. We believe this plan outlines the appropriate strategy for the guidance, evaluation, mitigation, and monitoring needed.

Please recognize that the information in this document is subject to change as the circumstances around the COVID-19 pandemic change. Spartan will continue to monitor the situation and comply with practices recommended by the CDC and other authorities. If anyone has questions or concerns, they are encouraged to reach out to their supervisor or HSE Representative.

## 1.1 COVID-19 – World Health Organization

Coronavirus disease (COVID-19) is an infectious disease caused by a newly discovered coronavirus.

Most people infected with the COVID-19 virus will experience mild to moderate respiratory illness and recover without requiring special treatment. Older people and those with underlying medical problems such as cardiovascular disease, diabetes, chronic respiratory disease, and cancer are more likely to develop serious illness.



The best way to prevent and slow down transmission is to be well informed about the COVID-19 virus, the disease it causes and how it spreads. Protect yourself and others from infection by washing your hands or using an alcohol-based rub frequently and not touching your face.

The COVID-19 virus spreads primarily through droplets of saliva or discharge from the nose when an infected person coughs or sneezes, so it's important that you also practice respiratory etiquette (for example, by coughing into a flexed elbow).

At this time, there are no specific vaccines or treatments for COVID-19. However, there are many ongoing clinical trials evaluating potential treatments. The World Health Organization (WHO) will continue to provide updated information as soon as clinical findings become available.

## 1.2 Spartan Response

In line with our company's philosophy and given the situation around the COVID-19 pandemic, this document has been constructed to provide guidance for employees and contractors as part of a plan to accomplish the following:

• Raise awareness and educate employees



- Implement effective mitigations & business continuity
- Monitor hazards, mitigations, & touch points
- Report on the effectiveness of the COVID-19 Response Plan

We are actively monitoring the situation in cooperation with various state, local, and federal authorities. The following information has been developed based on guidance from the WHO, CDC, OSHA, and our Clients.

# 2.0 Raise Awareness & Educate Employees

Spartan has, and will continue to implement a number of awareness and education initiatives as part of our campaign. In order the raise awareness and educate employees, we will focus on the following:

## 2.1 Morning Safety Meetings

Morning safety meetings are a critical time discuss needed safety topics, educate on what COVID-19 is, and to reinforce the principles of proper social distancing, hygiene, cleaning & housekeeping, and prompt reporting.

All safety meetings should be conducted with emphasis on social distancing and hygiene. As such, all morning safety meetings should be conducted according to the following Guidelines:

#### 2.1.1 Site Wide Meetings

- Meetings are conducted outside when possible rather than in cramped quarters. Employees are encouraged to spread out as much as possible.
- The CDC recommends a 6-foot buffer zone between people. This is not always feasible based on the size of crews, but for larger groups use of a bullhorn or speaker may allow employees to maintain personal space while still retaining the information presented.
- Site-wide meetings are kept to minimal duration to reduce exposure (10-15 minutes) and addresses important information for the entire group.

#### 2.1.2 Crew Meetings

- This meeting is not to exceed 10 people, as outlined by current CDC recommendations.
- Foremen are briefed and given materials such as handouts/fliers (if applicable) the day before on information to present to their crews during this meeting
- HSE provides support, speaking with the individual groups as needed

#### 2.1.3 HSE Safety Meeting Instruction

Along with general safety training on topics driven by leading/lagging indicators and scopes of work, HSE will be required to discuss the following points of emphasis with employees.



#### 1. COVID-19:

- Is a highly infectious disease
- o Spreads through droplets of saliva or discharge from the nose
- Spreads from your hands to your eyes, nose, mouth, and face
- Symptoms include: FEVER, COUGH, SHORTNESS OF BREATH

#### 2. Social Distancing:

- Maintain a 6-foot buffer between all employees on location
- Keep crew sizes to no more than 10 individuals

#### 3. Respiratory Etiquette & Hand Hygiene:

- Use and immediately dispose of all tissues on location
- If no tissue in hand cough or sneeze into your elbow
- $\circ$  Wash hands for a minimum of 20 seconds with soap and water
- o Use hand sanitizer in between hand washes
- Avoid touching your eyes, nose, mouth, and face

#### 4. Cleaning & Housekeeping

- Clean and disinfect frequently touched objects and surfaces using a regular household cleaning spray or wipe.
  - Examples include: Handrails, Door Handles, Steering Wheels, Equipment Controls, Keyboard/Mouse, Shared Tools, Cell Phones, etc.
- Keep worksites clean, organized, and free of debris

#### 5. Prompt Reporting

- Employees who are experiencing any of the symptoms (FEVER, COUGH, SHORTNESS OF BREATH), are required to STOP WORK and report it to their supervisor and/or HSE Immediately
- If you experience any of the symptoms (FEVER, COUGH, SHORTNESS OF BREATH) during non-work hours, DO NOT return to work and notify your supervisor and/or HSE Immediately

#### 2.2 Educational Posters

Multiple educational posters in both Spanish and English have been made available for the worksite. It is expected that the posters be placed in common areas throughout the job site. It is further expected the Manager, Supervisors, and HSE will be familiar with this document and these educational posters. These posters include:

- CDC: Coronavirus Disease 2019 (COVID-19) and you
- CDC: What to do if you are sick with coronavirus disease 2019 (COVID-19)
- CDC: Stop the Spread of Germs
- CDC: Share Facts About COVID-19



• ISNET: Coronavirus – Staying Informed

# 3.0 Implement Effective Mitigations & Business Continuity

Along with awareness and educational efforts, it is critical that effective mitigations be put in place on all locations to address daily employee screening, adequate stock and use of sanitation supplies, scheduling, case management, and business continuity. At a minimum, the following mitigations will be implemented on all locations:

## 3.1 Daily Employee Screening

Early detection of signs and symptoms is a critical component of our plan to combat COVID-19. As such, prior to the start of work each employee will be required to fill out a **CORONAVIRUS SCREENING QUESTIONNAIRE**. The questionnaire will be filled out utilizing an online form that can be accessed via URL and QR Codes posted on the jobsite. The questionnaire asks 6 symptom-related questions. Any employee who selects "Yes" to any one of these questions will immediately send a notification to site HSE, Site Operations Management, and the COVID-19 Case Manager. These employees will be immediately separated from all other employees and be put in touch with the COVID-19 Case Manager.

## 3.2 Sanitation Supplies

All projects and office locations will evaluate and monitor for an adequate supply of sanitation supplies and equipment. Further, they will ensure that these supplies are adequately and strategically positioned throughout the site. These Supplies and Equipment include the following:

- Tissue Paper
- Hand Washing Stations
- Hand Sanitizer
- Trash Receptacles
- Disinfectant Sprays
- Disposable Disinfectant Wipes
- Paper towels
- Nitrile and/or Latex Disposable Gloves

## 3.3 Use of Sanitation Supplies

All projects and office locations will ensure that employees have access to sanitation supplies. In addition, individuals should be assigned duties of cleaning all frequently touched surfaces in the workplace, such as workstations, countertops, and doorknobs periodically throughout the day. Those assigned these duties will do so with proper PPE, including Nitrile and/or Latex Disposable Gloves. Spartan will use the cleaning agents that are usually used in these areas and follow the directions on the label.

## 3.4 Housekeeping

Good housekeeping is an important component of any sanitation program. It is expected that work sites, shops, job trailers, offices, tool trailers, materials and laydown yards are neat, organized and free of debris. All loose trash and scraps should be properly discarded and thrown away.



## 3.5 Scheduling

Operations Managers, Supervisors, and Foremen should consider crew sizes while planning work activities to ensure crews are no more than 10 individuals. Where work tasks require individuals to work within the 6-foot social distancing recommendations, scheduling should seek to keep these activities to a minimum. Further, they should strategically plan/offset work activities and breaks to limit employee exposure by minimizing gatherings and enhance social distancing measures.

## 3.6 Case Management

In the event employees are reported or found to be ill off location and/or on location, the following measures will be implemented:

## 3.6.1 On Location Illness

Employees who report "YES" on the **CORONAVIRUS SCREENING QUESTIONNAIRE** or experience the onset of (FEVER, COUGH, SHORTNESS OF BREATH) while on location will undergo the following:

- Immediately separated from all other employees
- HSE will take an initial Incident Report
- HSE will put the employee in touch with the COVID-19 Case Manager (see 6.2 COVID-19 Case Manager)
- The COVID-19 Case Manager will work with the employee to ensure basic levels of care are in place, to include:
  - Safe transportation off location
  - Quarantine quarters
  - Basic needs being met (IE: food, medical, etc...)
- Following the COVID-19 Case Manager's direction, employees will be required to provide documented clearance from a physician prior to returning to work
- Employees who are unable to get clearance from a physician due to ongoing illness will be followed up with and monitored to ensure they are able to safely travel home or shelter in place/quarantine for 14 days.
- HSE will conduct a review of the employee's activities that day to evaluate exposure to other individuals contacted and surfaces/tools handled

#### 3.6.2 Off Location Illness

Employees who report (FEVER, COUGH, SHORTNESS OF BREATH) must **NOT** return to work. When it is reported, the following will take place:

- HSE will take an initial Incident Report
- HSE will put the employee in touch with the COVID-19 Case Manager (see 6.2 COVID-19 Case Manager)



- Following the COVID-19 Case Managers direction, Employees will be required to provide documented clearance from a physician prior to returning to work.
- The COVID-19 Case Manager will work with the employee to ensure basic levels of care are in place, to include:
  - o Safe transportation needs
  - Quarantine quarters
  - Other basic needs (IE: food, medical, etc...)

### 3.6.3 Employee with COVID-19 Diagnosis

If an employee is confirmed to have COVID-19, the following measures will be followed:

- HSE will take an initial Incident Report
- HSE will put the employee in touch with the COVID-19 Case Manager (see 6.2 COVID-19 Case Manager)
- The COVID-19 Case Manager will work with the employee to ensure basic levels of care are in place, to include:
  - Safe transportation needs
  - Quarantine quarters
  - Other basic needs (IE: food, medical, etc...)
- HSE will conduct a review of the employee's activities that day to evaluate exposure to other individuals contacted and surfaces/tools handled, but shall maintain confidentiality as required by the Americans with Disabilities Act (ADA) and the Health Insurance Portability and Accountability Act (HIPAA).
- Employees exposed to a co-worker with confirmed COVID-19 will be directed to the COVID-19 Case Manager for direction and referred to CDC guidance for how to conduct a risk assessment of their potential exposure.

#### 3.6.4 Employee Family Members with COVID-19 Diagnosis

If an employee's family member is confirmed to have COVID-19, the following measures will be followed:

- HSE will take an initial Incident Report
- HSE will put the employee in touch with the COVID-19 Case Manager (see resources)
- Following the COVID-19 Case Manager's direction, employees will be required to provide documented clearance from a physician prior to returning to work.

## 3.7 Travel

Prior to travel, whether business or personal, employees are advised to take the following precautions:

• Check the CDC's Traveler's Health Notices for the latest guidance and recommendations for each country to which you will travel. Specific travel information for travelers going to and returning from China can be found at on the CDC website.



- Employees should check themselves for symptoms of acute respiratory illness, including **FEVER**, **COUGH**, **SHORTNESS OF BREATH**, before starting travel, notify their supervisor and stay home if they are sick.
- Employees or employee's family members who become sick while traveling or on temporary assignment understand that they should notify their supervisor and should promptly call a healthcare provider.
- If outside the United States, sick employees should follow policies outlined by local authorities for obtaining medical care. They may contact a healthcare provider or overseas medical assistance company to assist them with finding an appropriate healthcare provider in that country. A U.S. consular officer can help locate healthcare services. However, U.S. embassies, consulates, and military facilities do not have the legal authority, capability, and resources to evacuate or give medicines, vaccines, or medical care to private U.S. citizens overseas.

### 3.8 Business Continuity

In the event of disruptions to normal business operations, the Spartan Business Continuity Plan (HSE-PRO-3075) should be put into effect. The plan is designed to assist planning for emergencies that result in access being restricted to the Corporate Headquarters, Satellite Offices, Projects, Processes, Services and Personnel across Spartan. The plan further identifies the rolls, responsibilities and processes that should be followed. Its objective is to accomplish the following:

- Define and prioritize the Critical Functions of the business
- Analyze the emergency risks to the business
- Detail the agreed response process to an emergency
- Identify Key Contacts during an emergency

Note: The Business Continuity plan should be tested (drilled) annually with the Emergency Response Team, as outlined in 4. COMPETENCY & TRAINING of the Business Continuity Plan HSE-PRO-3057. Further, the Business Continuity Plan shall be reviewed on an annual basis, in line with the Spartan Quality Management System Requirements.

# 4.0 Monitor Hazards, Mitigations, & Touch Points

Monitoring key touch points and evaluating mitigations is a key part of our plan. Effective monitoring and mitigations will help ensure that the site is clean, surfaces are clean, work habits are appropriate for conditions, and sanitation supplies are in stock and available to all employees on location as needed.

## 4.1 Coronavirus Site Audit

Until further notice, HSE and Operations will be conducting daily **CORONAVIRUS SITE AUDIT**'s. The purpose of the audit template is to monitor and track key needs and resources used to successfully mitigate COVID-19 on location. The template will cover Sanitation Supplies, the Use of Sanitation Supplies, evaluation of Commonly Touched Surfaces, evaluation of General Housekeeping, Working Habits and Conditions.



## 4.2 Coronavirus Education Verifications

Combatting COVID-19 is a global and individual effort. Ensuring our employees understand the risks and mitigations needed to prevent the spread of COVID-19 is a key component of this plan. To verify that the principles discussed at each safety meeting outlined in 2.1.3 HSE Safety Meeting Instruction are understood and followed, HSE and Operations will be conducting daily **CORONAVIRUS EDUCATION VERIFICATION**'s periodically throughout each day. The template will check an employee's knowledge of the principles outlined in 2.1.3 and their knowledge of where to find sanitation supplies, CDC and ISNET Posters, and how and when to contact their supervisor and/or HSE for assistance.

## 5.0 Report on the effectiveness of the COVID-19 Response Plan

Spartan will monitor the effectiveness of the COVID-19 Response Plan utilizing the data collected from the following sources:

- Coronavirus Screening Questionnaire
- Coronavirus Site Audit
- Coronavirus Education Verifications

This data will then be evaluated utilizing Business Intelligence Tools to look for trends and to ensure expectations are being met. The resulting **COVID-19 Response Plan Dashboard** will then be used to assist with weekly CDP Contractor/BPx COVID-19 Planning meetings. The following individuals attend the BPX COVID-19 HSE Teleconference:

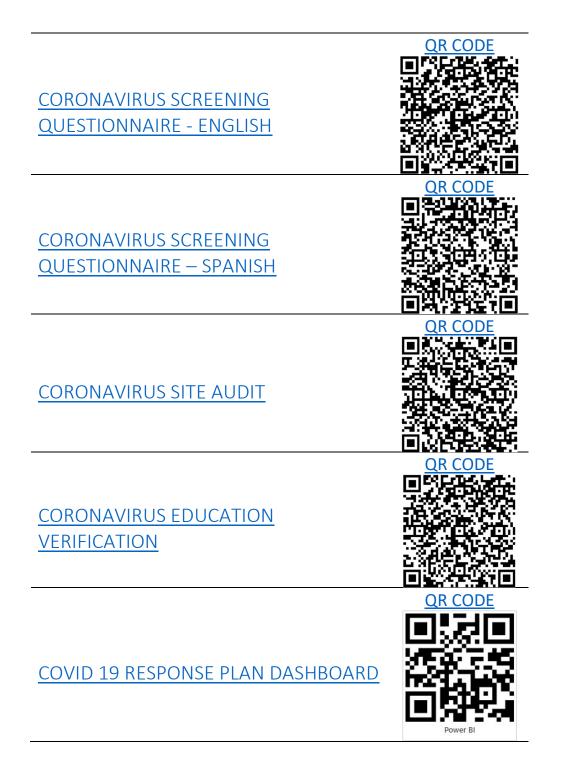
- Spartan President of Major Construction
- Spartan Director of HSE

## 6.0 Resources

Spartan will continue to monitor the situation and comply with practices recommended by the CDC and other authorities. If anyone has questions or concerns, they are encouraged to reach out to their supervisor or HSE Representative.



## 6.1 Spartan COVID-19 Response Plan Templates





## 6.2 COVID-19 Case Manager

#### Aaron Shifflet / HSE Director

ashifflet@spartancos.com / 970.698.0205

#### 6.3 BPx Resources

## 6.4 Federal Resources

Center for Disease Control and Prevention COVID-19 Resource Page: <u>https://www.cdc.gov/coronavirus/2019-ncov/index.html</u>

Coughing and Sneezing Etiquette: https://www.cdc.gov/healthywater/hygiene/etiquette/coughing\_sneezing.html

Clean Hands Webpage: https://www.cdc.gov/handwashing/index.html

Conducting a Risk Assessment:

https://www.cdc.gov/coronavirus/2019-ncov/php/risk-assessment.html

OSHA COVID-19 Resource Page:

https://www.osha.gov/SLTC/covid-19/index.html

#### 6.5 Revisions

Rev	Issue Date	<b>Description</b> (Note: Changes in document indicated with shaded	Review Due
		<mark>text</mark> )	Date
0	Mar 16, 2020	Initial Release	As Recommendations are updated
1	Mar 20, 2020	Changed requirement of doctor's note for acute respiratory illness. Added cell phones to items that should be cleaned. Updated "Social Distancing section to include more specific instruction around meeting formats per updated CDC recommendations.	As Recommendations are updated
2	Mar 25, 2020	Updated the document format. Attached the Executive Summary at the heading. Included additional instruction in 2.1.3 HSE Safety Meeting Instruction. Included 6.1 Spartan COVID-19 Response Plan Templates	As Recommendations are updated



Rev	Issue Date	<b>Description</b> (Note: Changes in document indicated with shaded text)	Review Due Date
3	04/17/20	• Outlined responsibilities to the COVID-19 Case Manager in 3.6.1, 3.1.2, &	As
		3.1.3	Recommendations
		Added Business Continuity Plan to 3.8	are updated
		Added who attends the BPx COVID-19 HSE teleconference to 5.0	



# **COVID 19 RESPONSE PLAN – SITE POSTER**

<b>English</b> coronavirus screening questionnaire	<b>Español</b> cuestionario de detección de coronavirus
You will be required to complete this questionnaire daily, prior to entering the	Usted deberá completar este cuestionario diariamente antes de ingresar al lugar de

work location and starting work.



If your have any syptoms or conditions discussed in CORONAVIRUS SCREENING QUESTIONNAIRE, additional evaluation needed before entry to the site. Please report immediately to your Supervisor or HSE.

trabajo y comenzar a trabajar.



Si tiene alguno de los síntomas discutidos en el CUESTIONARIO DE DETECCIÓN DE CORONAVIRUS, se necesita una evaluación adicional antes de entrar al sitio de trabajo. Porfavor, informe inmediatamente a su Supervisor o persnal de HSE sobre cualquier acontecimiento.