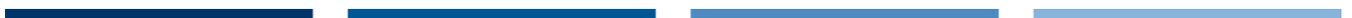




06 | 1 | 2020

COVID-19 SAFE WORK PLAYBOOK

(Updated 11 /16 / 2020)





INTRODUCTON

At VAST, it is our priority to keep our employees and their families healthy, especially in the midst of the COVID-19 pandemic. This COVID-19 Safe Work Playbook details how we plan to control, prevent, and mitigate the spread of COVID-19 and continue to keep our employees safe to every extent possible. This plan, which pulls from the Center for Disease Control and Prevention (CDC), the Michigan Occupational Safety and Health Administration (MIOSHA) guidance and the Department of Labor and Economic Opportunity (LEO) highlights the responsibilities of management and employees, and outlines the steps VAST is taking to address COVID-19.

While we will implement various protocols to ensure your safety, it is up to you and your team to execute on these protocols daily. By releasing this Safe Work Playbook, VAST hopes to clearly communicate our plans moving forward, highlighting workplace protocols in place to protect your safety and establish a level of comfort for our team when you are in the office.

We understand that every employee's situation is different and encourage those with specific risks or concerns to reach out to management to discuss alternative arrangements, should they be necessary.

Our employees fall into one or more of the following categories defined by MIOSHA:

- Lower exposure risk (the work performed does not require direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public).
- Medium exposure risk (the work performed requires frequent and/or close contact with people who may be with COVID-19 but who are not know COVID-19 patients, or contact with the general public where there is ongoing community transmission).

All Employees will be trained on all health and safety measures. We have identified COVID Task Force members who will be on-site supervisors and ensure that all safety measures pursuant to this plan are followed. The COVID Task Force members are laid out in our COVID-19 Employee Resource Sheet.





Definitions

Close Contact: someone who was within 6 feet of an infected person for a cumulative 15 minutes or more; and over a 24-hour period starting from two days before illness onset.

COVID-19: coronavirus disease 2019, a severe acute respiratory disease characterized by symptoms including fever, cough, fatigue, and shortness of breath, which may progress to pneumonia, multi-organ failure and death.

Known Cases of COVID-19: person who has been confirmed through diagnostic testing to have COVID-19.

SARS-CoV-2: severe acute respiratory syndrome coronavirus 2, the virus, which is the causative agent of COVID-19.

Suspected Cases of COVID-19: persona who have symptoms of COVID-19 but have not been confirmed through diagnostic testing or person who has had close contact with a person who has been confirmed through diagnostic testing

Phases

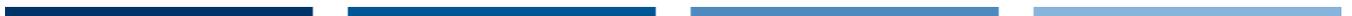
Phase One

All employees work remotely, with some team members performing work in the office on an occasional basis, primarily for mail or other critical office functions.

The VAST office will also be available for training of VAST team members for those tasks, which cannot be trained virtually. These trainings must be coordinated with Human Resources.

It is required that employees wear masks and maintain social distancing practices while onsite at the VAST Office. It is also required that employees abide by any additional safety measures established as part of the COVID-19 Safe Work Playbook.

The office is closed to the public and we are working with clients, vendors and company partners virtually.





Volunteer activities by employees are mostly suspended, however; we are still participating in charitable giving and other events at the discretion of management with safety of all as the first priority.

Client visits to client-based locations by Advisors shall be essential only. Advisors will first offer to accomplish the task virtually. It is recommended that the Advisors wear masks and maintain social distancing practices while onsite at a client office or worksite or other location. It is also recommended that the Advisors abide by any additional safety measures the clients have in place at their offices.

Essential only business-related travel will continue but during travel, employees shall maintain social distancing and it is highly recommend not traveling in the same car together unless part of the same household and/or family.

No conferences or other offsite events will be attended unless deemed essential.

All team and other meetings are virtual. If it is essential to meet in person all parties shall wear masks and social distancing measures shall be put into place.

Phase One A

Everything under Phase One with the addition of:

Client visits to VAST office accompanied by Personal Risk Managers and Individual Medical Advisors and Account Managers shall be essential only. Personal Risk Managers and Account Managers will first offer to accomplish the task virtually and will abide by the visitor health screening procedure for those clients that are deemed essential.

It is required that the Personal Risk Managers, Individual Medical Advisors and Account Managers wear masks and maintain social distancing practices while onsite at VAST office with clients. It is also required that Personal Risk Managers, Individual Medical Advisors and Account Managers abide by any additional safety measures established as part of the COVID-19 Safe Work Playbook.

Phase Two

Under Phase Two, we will have employees return to the office but only those workstations will be utilized where social distancing protocols can be put into place and all social distancing protocols will be followed. Employees are encouraged to wear masks at all times. Masks are





required to be worn at all times when not at their individual workstation and in all shared work areas.

Remote work and virtual resolution of issues will still be encouraged.

The remainder of our employees will remain home and work remotely unless a need arises for them to return to the office and should this occur social distancing protocols would be followed.

Employees working in the lower level shall utilize the back staircase when entering and exiting the building and shall remain 6 feet apart from all others entering or exiting at the same time.

Employee's working on the first floor shall utilize the parking lot entrance when entering and exiting the building, and shall remain 6 feet apart from all others entering or exiting at the same time.

Employees working on the second floor shall utilize the back staircase to enter and exit the building, and shall remain 6 feet apart from all others entering and exiting at the same time.

Essential only business-related travel will continue under [Phase Two](#) but during travel, employees shall maintain social distancing and highly recommend not traveling in the same car together unless part of the same household and/or family.

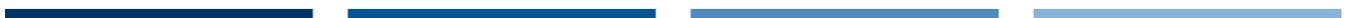
All team meetings shall be virtual, and employees in the office are encouraged to also meet virtually but also have the option to meet in person while wearing their masks and practicing social distancing.

Interior doors will remain open to minimize contact; front desk employees will close them at the end of the day.

Copiers and other surface areas that employees touch will be wiped down after each use. Employees should wash their hands with warm water and soap for at least 20 seconds after cleaning and sanitizing a surface.

We will be closed to client, company and all other in-office visits and all matters will continue to be handled virtually.

Client visits to client-based locations by Advisors shall continue and shall be essential only. Advisors will first offer to accomplish the task virtually. The Advisors shall wear masks and maintain social distancing practices while onsite at a client office or worksite or other location.





The Advisors will also abide by any additional safety measures the clients have in place at their offices.

Volunteer activities will continue to be suspended.

Conferences or other offsite events will be attended if deemed essential.

Employees are encouraged to bring lunch boxes with ice packs to only utilize the refrigerator as needed. Employees are also encouraged to take their lunch and breaks offsite and not to congregate together.

There will be no shared water or coffee; if using the Keurig, it must be cleaned after each use.

Common areas will be used only as necessary and the bathrooms and break room will be used with masks on and social distancing measures in place.

We will set-up contactless drop zones for all deliveries, including mail and packages by the back door. An assigned contact or contacts will process mail and packages at least three times per week, utilizing gloves and masks.

Employees ordering food delivery will need to instruct drivers to utilize the back door for contactless delivery.

Employees will keep their jackets at their desk instead of a community closet.

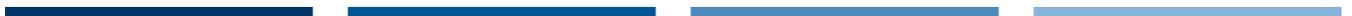
[Phase Two A:](#)

Everything under Phase Two with the addition of:

Clients in the office shall be seen by appointment only and only as deemed essential by the employee assisting them. All employees shall first offer to resolve the matter virtually.

Clients in the office will be limited to designated spaces on the first floor only that have physical barriers in place and/or at least 6 feet of spacing between employees and clients.

Company visits shall be essential only and all matters that can be handled virtually are encouraged to do so.





All visitors to the office will be required to wear a facemask and to answer some questions prior to coming into the office. All clients will be asked to maintain social distancing during appointments.

Phase Three:

Everything under Phase Two with the addition of:

Reopening the office to the public.

A communication plan will be put into place on how to inform the public that we are reopening and the parameters in place for doing so. We will still encourage clients to set appointments first before coming to the office and we will make every effort to assist clients virtually.

Phase Four

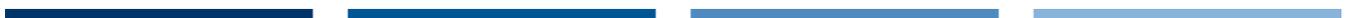
Under Phase Four, after the COVID pandemic is over, the agency will begin our new normal with client visits, business travel, volunteer activities, shared food and common areas again being utilized. However, remote work and virtual resolution of issues will still be encouraged.

VAST may extend our social distancing guidelines after the agency completely reopens.

Considerations

It is important to note that these phases are tentative and are subject to change based on state and local guidance, and the pandemic itself. Should an employee test positive for COVID-19 after the Safe Work Playbook is established, our plan may change in an effort to protect our team. In addition, if cases of COVID-19 spike again in our state or in our local area, we will consider whether a phase change is needed.

Workplace Protocols to Follow





VAST has implemented various workplace protocols designed to preserve the health and safety of our team as we return to the office. This section further explains these protocols. For additional information, please reach out to management.

Employee Screening/Reporting Transparency Protocols

An employee screening will be implemented on a nondiscriminatory basis, and all information obtained will be treated as confidential medical information – specifically, the identity of workers exhibiting a fever or COVID-19 symptoms should only be shared with management with true need to know.

VAST employees will be asked to confirm the status of their health as part of working in the office. VAST reserves the right to implement a screening protocol for symptoms including a signed certification. At this point in time VAST will be implementing a screening protocol through MI SYMPTOMS app for all employees working in the office on a daily basis. Results will be tracked separately from any personnel records and will be kept confidential. Employees unwilling to complete a screening will be required to work remotely.

VAST employees are asked to notify management if they have engaged in travel outside of the Upper Peninsula with the past 14 days prior to entering the workplace. They may be requested to self-quarantine at home for fourteen (14) days or as prescribed by their healthcare provider.

Should an employee develop any symptoms while at the office, they shall exit the building immediately and notify Management. If they are unable to exit the building, they shall go to Pam's office and shut the door and call Management immediately.

Any VAST team member who experiences COVID-19 symptoms or has tested positive for COVID-19 must notify management as soon as practicable and not enter the office. The Marquette County Health Department will immediately be notified of any VAST employee who tests positive for COVID-19. The employee will be asked to assist with contact tracing. This information will be tracked separately from personnel records, and names will not be released. Within 24 hours, VAST will notify co-workers, contractors or vendors who may have come into contact with the person with a confirmed case of COVID-19. VAST may elect to close the agency for a period of 72 hours following a confirmed case to allow for natural deactivation of the virus.

COVID-19 Exposure and Confirmed Illness Protocol





Employees who test positive for COVID-19 or believe they have been infected will be instructed to follow the advice of a qualified medical professional and self-quarantine. When self-quaranting, employees should:

- Stay away from other people in their home as much as possible, stay in a separate room and use a separate bathroom if available.
- Not allow visitors.
- Wear a face mask if they have to be around people.
- Avoid sharing household items, including drinking cups, eating utensils, towels and bedding.
- Clean high-touch surfaces daily.
- Continue monitoring their symptoms, calling their health care provider if their condition worsens.

Notably, employees who are symptomatic or who have tested positive should not return to work until their conditions outlined in the table below are met:

Safe Work Playbook Work Considerations	
<p>Employee who had close contact with an individual who tested positive with COVID-19 or was with an individual who displayed the principal symptoms of COVID-19.</p>	<p>Employee has tested positive or displayed the principal symptoms for COVID-19.</p>
<p>The employee cannot report to work until <u>one</u> of the following conditions were met:</p> <ul style="list-style-type: none"> • Fourteen days had passed since the employee last had close contact with the individual. • The individual with whom the employee had close contact received a negative COVID-19 test result. <p>Under the latest definition, a person is a “close contact” if the person was:</p> <ul style="list-style-type: none"> • Within six feet of an infected person; 	<p>The employee cannot report to work until <u>all</u> of the following conditions are met:</p> <ul style="list-style-type: none"> • If the employee had a fever, 24 hours had passed since the fever had stopped without the use of fever-reducing medication. • Ten days had passed since either the date of the employee’s symptoms first appeared, or the date the employee received the test that yielded a positive result for COVID-19, whichever was later. • The employee’s principal symptoms of





<ul style="list-style-type: none">• For a cumulative total of 15 minutes or more; and• Over a 24-hour period starting from two days before illness onset (or, for asymptomatic patients, two days prior to test specimen collection) until the time patient is isolated.	COVID-19 had improved.
---	------------------------

When an employee tests positive for COVID-19, deep-cleaning procedures will be triggered. Furthermore, employees who have been in close contact with an individual who has tested positive for COVID-19 will be instructed to self-quarantine.

Social Distancing Protocols

Employees should follow social distancing best practices while at VAST including but not limited to workstations, breakrooms, common areas, and offices. Specifically, employees are asked to:

- Stay 6 feet away from others when working or on breaks. Masks will be worn.
- Avoid job tasks that require face-to-face work with others when possible.
- Avoid contact with others whenever possible (e.g., handshakes).
- Avoid touching surfaces that may have been touched by others when possible and/or using others equipment (phones/desks/computers, etc.).
- Distance himself or herself from anyone who appears to be sick.
- Avoid gathering when entering or exiting VAST. Employees should also only enter and exit designated areas.
- Follow any posted signage regarding COVID-19 social distancing practices.
- Disinfect their workspace at the end of every day they are in the office.
- Avoid touching their face.
- Avoid nonessential gatherings.
- Stagger lunches to limit the number of individuals in the breakroom.
- Avoid using common areas.

Employee Health Protocols

The success of our Safe Work Playbook relies on how well our team follows social distancing and health and safety protocols. As such, the following protocols have been implemented to





ensure your health and safety. Please bring any concerns regarding the following protocols to management immediately.

General Employee Health and Hygiene

Practicing good hygiene is essential to prevent the spread of COVID-19. Do your part by practicing good hygiene at work and at home:

- Regularly wash your hands for least 20 seconds throughout the day with warm water and soap, specifically before eating.
- Cover cough and sneezes.
- Avoid touching your eyes, nose, and mouth.

To help employees remain healthy, VAST has hand sanitizer and disinfecting wipes available throughout the office. We have limited amounts of these supplies and will continue to restock, as we are able. It is suggested that employees wash their hands more frequently than normal.

Additionally, management has instructed the office cleaning crew to disinfect key areas such as faucets, door handles, and key pads on a daily basis.

We will provide employees with masks and they will be located onsite in several areas. Employees may also provide their own face coverings if they wish.

It is required (unless unable to do so because of medical concerns) that employees wear face coverings when entering and exiting VAST and when using common areas such as bathrooms, breakrooms and the reception area and all shared work spaces.

Office Procedures

Employees have the right to safe and healthy workplaces. Management will provide support for all safe and health initiatives. Management will ask all employees to watch a training video on this issue. Management will consider all employee suggestions for achieving a safer, healthier workplace. Management will also keep informed about workplace safety and health hazards. If you have concerns about unsafe or unhealthy working conditions, please contact management.

Conclusion





The COVID-19 pandemic has created uncertain times and resulted in unprecedented workplace changes. As communicated through this Safe Work Playbook, we are prioritizing the health of our team every step of the way as we transition through the Phases of the Safe Work Playbook.

Finally, we ask that the team is patient and understanding of the fact that the COVID-19 pandemic may require our Safe Work Playbook to change. Employees will be given as much notice as possible in the event an unforeseen setback or complete remote work environment is reinstated.

Furthermore, while the strategies highlighted in this document can protect workers from COVID-19, it is important to follow CDC guidelines at all times. For more information, follow this link:

<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>

