

## COVID-19 Coronavirus Control Policy

Surge will take proactive steps to protect the workplace in the event of an infectious disease outbreak. It is the goal of Surge during any such time to strive to operate effectively and ensure that all essential services are continuously provided and that employees are safe within the workplace.

Surge is committed to providing authoritative information about the nature and spread of COVID-19 Coronavirus, including symptoms and signs to watch for, as well as required steps to be taken in the event of an illness or outbreak.

### **Preventing the Spread of COVID-19 in the Workplace**

Surge will ensure employees take proactive measures to ensure a clean workplace, including the regular cleaning of objects and areas that are frequently used, such as bathrooms, breakrooms, conference rooms, door handles, workstations, countertops, and railings. A committee has been designated to monitor and coordinate events around the COVID-19 Coronavirus pandemic as well as to create work rules to promote safety through infection control.

We expect and require all employees to cooperate in taking steps to reduce the transmission of the COVID-19 Coronavirus in the workplace. The best strategy remains the most obvious—frequently washing your hands with soap and water for at least 20 seconds or using hand sanitizer with at least 60% alcohol if soap and water are not available; staying at home when ill; wearing personal health attire in accordance with the Centers For Disease Control and Prevention's recommendations such as cloth facial coverings<sup>1</sup>; practicing safe social distancing measures; and covering your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow. Throw used tissues in the trash and immediately wash hands with soap and water for at least 20 seconds. If soap and water are not available, use hand sanitizer containing at least 60% alcohol. Learn more about coughing and sneezing etiquette on the [CDC website](#).

Because Surge is a critical infrastructure business, Surge will follow CDC guidance regarding [critical infrastructure workers](#). Individuals who believe they may face challenges reporting to work during an infectious disease outbreak should take steps to develop any necessary contingency plans. For example, employees might want to arrange for alternative sources of childcare should schools close and/or speak with supervisors about an alternative work schedule. Individuals that require a reasonable accommodation should contact Human Resources.

### **Limiting Travel**

All nonessential travel should be avoided until further notice. Employees who travel as an essential part of their job should consult with management on appropriate actions. Business-related travel outside the United States will not be authorized until further notice.

Employees should avoid crowded public transportation when possible. Alternative scheduling options, ride-share resources and/or parking assistance will be provided on a case-by-case basis. Contact Human Resources for more information.

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<sup>1</sup> Although facial coverings are not PPE, all employees must review OSHA's Appendix D, information for employees using respirators when not required under the standard, which is attached to this policy.

## Telecommuting

Telework requests will be handled on a case-by-case basis. While not all positions will be eligible, all requests for temporary telecommuting should be submitted to your manager for consideration.

## Workers at Higher Risk

Employees who are at [increased risk for complications](#) from COVID-19 are urged to consult their physician about steps they can take to protect their health. Those requiring an accommodation under the Americans with Disabilities Act should contact Human Resources. Human Resources will confidentially evaluate the request, explore alternatives, and attempt to appropriately address the employee's health concerns while maintaining Surge's operations. A doctor's note may be required. Except for employees who formally request a change in job circumstances due to qualifying underlying health conditions, employees will generally not be reassigned to new duties or roles or be provided with sick time solely to address concerns about the potential for COVID-19 infection.

## Staying Home When Ill

Many times, with the best of intentions, employees report to work even though they feel ill. During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing the following symptoms: fever, cough, difficulty breathing, or other COVID-19 symptoms.

- Employees who have COVID-19 [symptoms](#) (i.e., fever, cough, or shortness of breath) should notify their supervisor and stay home.
- Employees who experience symptoms while at work should immediately notify their supervisor and should be sent home. If the individual is unable to immediately leave the premises, the associate will be separated from other employees and visitors until they are able to do so.
- Sick employees should follow [CDC-recommended steps](#). Employees should not return to work until the criteria to [discontinue home isolation](#) are met, in consultation with healthcare providers and state and local health departments.

Employees who have been tested because they are under a suspicion that they have COVID-19 or because they have signs or symptoms of COVID-19 should stay home until test results are known. Employees who test positive will be required to stay home for an additional period of time in accordance with the recommendations or requirements of federal, state, or local health authorities.

## Close Contact with COVID-19

Employees who are asymptomatic, but who have had direct exposure to a person with COVID-19 should notify their supervisor and may continue to work in select circumstances while following [CDC recommended precautions](#); otherwise they should quarantine for up to 14 days, consistent with the CDC's [recommendations](#).

## Requests for Medical Information and/or Documentation

If you are out sick or show symptoms of being ill, it may become necessary to request information

from you and/or your health care provider. In general, we would request medical information to confirm your need to be absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work. As always, we expect and appreciate your cooperation when medical information is sought.

### **Confidentiality of Medical Information**

Our policy is to treat any medical information as a confidential medical record. In furtherance of this policy, any disclosure of medical information is in limited circumstances with supervisors, managers, first aid and safety personnel, and government officials as required by law. Health questionnaires or assessments, if any, will be stored separate from the personnel file. As with all medical information, the fact that an employee has a fever, or any other symptoms is subject to ADA confidentiality requirements.

### **Social Distancing Guidelines**

Surge has implemented the following social distancing guidelines to minimize the spread of the disease among the staff.

While at the workplace, employees are required to adhere to and/or enforce the following:

1. Avoid meeting people face-to-face. Employees are encouraged to use the telephone, online conferencing, email, or instant messaging to conduct business as much as possible, even when participants are in the same building.
2. Limit the number of applicants and employees to no more than 10 at a time or 50% occupancy.
3. Maintain a social distance of no less than six feet from all other individuals while at the worksite.
4. Designate with signage, tape, or other means six-foot spacing for employees and applicants to maintain appropriate distance.
5. In the seating areas, only every other seat should be used, and no one should be seated next to each other.
6. While in the testing area, employees and applicants should be seated at alternating stations and, again, not next to one another. Whenever possible, please encourage applicants and employees to utilize the web portal to minimize the in-person contact time.
7. If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room, and sit at least six feet from each other; avoid person-to-person contact, such as shaking hands.
8. Avoid any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops, and training sessions.
9. Do not congregate in workrooms, pantries, break areas, or other areas where people socialize.
10. Eat lunch away from others (avoid lunchrooms and crowded restaurants).
11. Encourage customers, employees, and others to request information and orders via phone and email to minimize person-to-person contact. Have the materials and information ready for fast pick-up or delivery.
12. Comply with local, state, or federal requirements regarding COVID-19.

13. All internal Surge employees are required to wear a cloth face-covering while present in the workplace except under such circumstances whereby a medical or other legal exception applies. If such an exception exists, this must be communicated to the Human Resources Department immediately.
14. Surge internal employees are prohibited from sharing equipment, when possible.

## Outside Activities

Employees are encouraged to the extent possible to:

1. Avoid public transportation (walk, cycle, drive a car) or go early or late to avoid rush-hour crowding on public transportation.
2. Avoid recreational or other leisure classes, meetings, activities, etc., where employees might encounter contagious people.
3. Follow [CDC Guidance on Protecting Yourself and Others](#).

## Cleaning and Disinfection

Employees must perform routine environmental cleaning and disinfection of their Surge location(s).

Surge provides EPA-approved disinfectants to each Surge location. Each Surge location is to clean and disinfect all frequently touched surfaces in the workplace, including, but not limited to, workstations, keyboards, telephones, handrails, and doorknobs. All testing or onboarding stations are to be disinfected and rotated between users.

- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection, most common EPA-registered household disinfectants should be effective. A list of products that are EPA-approved for use against the virus that causes COVID-19 is available [here](#). Follow the 'manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method and contact time, etc.).
- Employees should not use each other's phones, desks, computers, tools, or workstations. If this is not possible, all equipment must be disinfected before and after each use.
- In all instances above, including when a sick employee is suspected or confirmed to have COVID-19, Surge will follow the [CDC cleaning and disinfection recommendations](#).
- Those performing routine cleaning functions are required to wash their hands often (for at least 20 seconds), including, but not limited to, after removing gloves.

## General Protocols

- Surge requires employees to do a self-assessment each day to check if they have COVID-19 [symptoms](#) (such as fever, cough, or shortness of breath).
- Surge separates employees who appear to have acute respiratory illness symptoms from other employees and sends them home immediately.
- Surge displays appropriate signage to reinforce key messages—stay at home when sick, use cough and sneeze etiquette, and practice hand hygiene. Surge also provides

protection supplies, where available, such as soap and water, hand sanitizer, tissues, and gloves.

- Surge requires all employees to review and adhere to the Hazard Communication, Blood Borne Pathogen Exposure Control Plan, First Aid, Respiratory Protection, and Personal Protection Equipment policies and procedures, all of which can all be found on Surge Inside under the Safety forms and documents.

## Facial Coverings

Unless an exception applies, Surge requires all employees to wear cloth facial coverings in accordance with the current Centers for Disease Control and 'Prevention's guidelines. Facial coverings, unlike N95 respirators, lack a filtration system that prevents particles from entering the lungs. These are not to be considered a substitute for social distancing or other respiratory protection equipment specifically tested and meant for particle protection. Cloth facial coverings are not rated by NIOSH, are a supplemental protection recommended by the CDC, and are personal health apparel. Surge will provide all internal associates with an initial facial covering free of charge. Surge employees may also elect to use a separate facial covering of their own choosing if it meets the current CDC guidelines, is professional in nature, and consistent with established dress code policies.

Employees required to wear respirators as part of their jobs must participate in a full respiratory protection program. That can require some extensive measures be taken, such as medical examinations and respirator fit testing.

However, an employee wishing to wear a paper dust mask or similar filtering-face piece respirator for protection against nuisance levels of dust may choose to do so without having to go through the rigors of the entire program. Instead, OSHA only requires their employer provide them with the information contained in Appendix D of the OSHA standard for respiratory protection.

Surge has a copy of this appendix (attached to this handout) available for you to view on Surge Inside under the Safety Forms and Documents. Here is an overview of the information contained in that appendix:

Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the 'respirator's limitations.

Choose respirators certified for use to protect against the contaminant of concern.

NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.

Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.

Keep track of your respirator so that you do not mistakenly use someone else's respirator.

Surge allows workers to wear paper dust masks voluntarily, but we do insist that you adhere to the recommendations contained in Appendix D of the OSHA respiratory protection standard.

Please contact the Risk Management Department at 614-431-5100 with any questions, concerns, or comments about the voluntary use of a paper dust mask or similar filtering facepiece respirator while at work.

### **Notifying Employees of Possible Exposure**

Surge follows CDC guidelines for notifying employees who have had [close contact](#) with a confirmed case of COVID-19 while maintaining confidentiality, as required under the Americans with Disabilities Act.

### **Compliance with Law**

Surge complies with all local, state, and federal laws. In the event of a conflict between this policy and federal law, federal law shall prevail. In the event of a conflict or perceived conflict between Surge-issued state guidelines and this policy, please contact the Legal Department for clarification. Generally, the most stringent guideline will apply.

Employees must abide by all applicable testing, quarantine, and other recommendations and requirements issued by federal, state, and local governing bodies relating to COVID-19 and the return to work.

This policy does not imply or constitute a contract. Surge may, at its sole discretion, change this policy at any time without notice.

### **Training**

All employees are required to complete Surge COVID-19 Training and are expected to read, understand, and take all required steps to adhere to this policy.

### **Reporting**

All employees are required to report any suspected or confirmed violation of this policy to Safety and/or Legal at 614-431-5100 or by [email](#).

## Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator. [63 FR 1152, Jan. 8, 1998; 63 FR 20098, April 23, 1998]