



COVID-19 PREPAREDNESS AND RESPONSE PLAN

May 29, 2020

At **McPherson Oil Company (“Company”)**, the health and safety of our employees is of utmost importance to us. As a critical infrastructure business supporting the Energy Industry, it is necessary for certain employees to continue in-person work in order to conduct minimum basic operations for our business. We want you to know that we are committed to reducing the risk of exposure to COVID-19 and we are ready to provide a healthy and safe workplace for our employees, customers and guests.

Our plan is based on information and guidance from the Centers for Disease Control (CDC), the Occupational Health and Safety Administration (OSHA) and the State of Michigan at the time of its development. Because the COVID-19 situation is frequently changing, this plan may be modified based on further guidance.

Company is focused on three lines of defense:

1. Limiting the number of people together at the same time in the same place,
2. Sanitizing all areas and
3. Requiring appropriate personal protection equipment including masks and gloves

The spread of COVID-19 in the workplace can come from several sources:

- Co-workers
- Customers
- Guests – vendors/visitors

Our in-person work is primarily performed in an office environment. As such, employees required to perform in-person work fall into one or both of the following categories as defined by OSHA:

- 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 may require frequent/close contact with people who may be infected, but who are not known or suspected patients).

COVID-19 WORKPLACE COORDINATORS

Company has designated the following officers as its COVID-19 workplace Coordinators:

- Mark A. Frank – President – markfrank@mcpoil.com
- Tom P. Turzewski – Chief Financial Officer – tturzewski@mcpoil.com
- Kevin Jamieson – Vice President – kjamieson@mcpoil.com

In the event that a Coordinator is not available in the workplace, the Company designates the following staff as workplace Supervisors:

- Rob Ward – rward@mcpoil.com
- Don Phillips – dphillips@mcpoil.com
- Cheryl O’Hara – cohara@mcpoil.com
- Terry Curry – tcurry@mcpoil.com

Coordinators and Supervisors may be contacted via their respective email address or by calling our main office at (517) 546-4600. Our mailing address is 124 W. Grand River Ave., Howell, MI 48843.

RESPONSIBILITIES OF COMPANY COORDINATORS

Company Coordinators must be familiar with this Plan and be ready to answer questions from employees. The Coordinators responsibilities include:

- Staying up to date on federal, state and local guidance.
- Incorporating those recommendations into our workplace.
- Training employees on control practices, proper use of personal protective equipment, and the steps employees must take to notify our business of any COVID-19 symptoms or suspected cases of COVID-19.
- Reviewing HR policies and practices to ensure they are consistent with this Plan and existing local, state and federal requirements.
- Keeping a record of all self-screening protocols for all employees, customers or guests entering the worksite, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed cases of COVID -19.

Company Coordinators and Supervisors will:

- Set a good example by following this Plan. This includes practicing good personal hygiene and workplace safety practices to prevent the spread of the virus and encouraging this same behavior from all employees.
- Keep everyone on the worksite premises at least six feet from one another to the maximum extent possible, including through the use of ground markings, signs, and physical barriers, as appropriate to the worksite.
- Provide non-medical grade face coverings to their employees, with supplies of N95 masks and surgical masks reserved, for now, for health care professionals, first responders (e.g., police officers, fire fighters, paramedics), and other critical workers.

- Require face coverings to be worn when employees cannot consistently maintain six feet of separation from other individuals in the workplace.
- Increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (e.g., door handles), paying special attention to shared items (e.g., coffee maker, toilets, copier machine, etc.).
- Adopt protocols to clean and disinfect the facility in the event of a positive COVID-19 case in the workplace.
- Make cleaning supplies available to employees upon entry and at the worksite and provide time for employees to wash hands frequently or to use hand sanitizer.
- When an employee is identified with a confirmed case of COVID-19, within 24 hours, perform ALL of the following:
 - a. Notify a Company Coordinator.
 - b. Coordinator will notify the local health department (Livingston County).
 - c. Coordinator will notify any co-workers, customers, or guests who may have come into contact with the person with a confirmed case of COVID-19.
- Train employees on how to report unsafe work conditions.

RESPONSIBILITIES OF EMPLOYEES

Company asks each employee to help with our prevention efforts while at work in order to minimize the impact of COVID-19 at our facility. We have instituted several best practices to minimize exposure to COVID-19 and prevent its spread in the workplace. This includes specific cleaning efforts and social distancing. While at work, all employees must follow these best practices for them to be effective. Beyond these best practices, we require employees to contact a Company Coordinator or Supervisor immediately if they incur unsafe working conditions or are experiencing signs or symptoms of COVID-19, as described below. If employees have specific questions about this Plan or COVID-19, they should ask a Company Coordinator or Supervisor.

OSHA and the CDC Prevention Guidelines

OSHA and the CDC have provided the following preventive guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with anyone who is sick.
- Maintain appropriate social distance of six feet to the greatest extent possible.

Additionally, employees must familiarize themselves with the symptoms and exposure risks of COVID-19. The primary symptoms of COVID-19 include the following:

- Dry cough;

- Shortness of breath or difficulty breathing

Or at least two of these symptoms:

- Fever (either feeling feverish or a temperature of 100.4 degrees or higher);
- Chills
- Repeated shaking with chills
- Muscle pain
- Headache
- Sore throat
- New loss of taste or smell

Individuals with COVID-19 may also have early symptoms such as, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as an atypical cough or shortness of breath, do not report to work. You must also notify your supervisor immediately and consult with your healthcare provider. Similarly, if employees come into close contact with someone showing these symptoms, they must notify their supervisor immediately and consult with their healthcare provider. Company has the responsibility to work to identify and notify all employees who have close contact with individuals with COVID-19 symptoms. “Close contact” is not brief or incidental contact with a person with COVID-19 symptoms.

The CDC defines “close contact” as either:

- Being within roughly six feet of a COVID-19 infected person or a person with any symptom(s) for a “prolonged period of time” (the CDC estimates range from 10 to 30 minutes); or,
- Having direct contact with infectious secretions of a COVID-19 infected person or a person with any COVID-19 symptom(s) (i.e., being coughed on).

HEALTH AND SAFETY PREVENTATIVE MEASURES FOR COMPANY

Company has put a number of best practices and measures in place to ensure the health and safety of its employees, customers and guests. Our Plan is focused on three lines of defense – limiting the number of people together at a time, sanitizing all areas and requiring the use of personal protection equipment when 6’ minimum spacing cannot be consistently applied.

Company takes the following steps to minimize exposure from co-workers to COVID-19:

General Education

- Posting CDC information, including recommendations on risk factors.
- Informing employees of the importance of good hand hygiene. Regularly washing hands with soap and water for at least 20 seconds is one of the most effective ways for employees to minimize exposure to COVID-19. If soap and water are not readily available, employees should use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water should be chosen over hand sanitizer.

- Encourage good hand hygiene by ensuring that adequate supplies of soap and hand sanitizer are maintained and placing hand sanitizers in multiple locations.
- Discourage handshaking and encourage the use of other non-contact methods of greeting.
- When possible, avoid the use of other employees' phones, desks, offices, other work tools and equipment, and other commonly touched surfaces.
- If the above cannot be avoided, clean and disinfect them before and after use.

Social Distancing

- Limit in-person meetings.
- Restrict the number of workers present on-site to no more than necessary.
- Limit in-office hours and/or promote remote work as much as possible.
- Encourage and require social distancing to the greatest extent possible while in the workplace.
- Encourage employees to minimize ridesharing. If this cannot be avoided, while in vehicles, employees must ensure adequate ventilation.
- Encourage the use of masks and gloves.
- Do not share food utensils and food with other employees.
- In areas where employees work within 6 feet of each other, computer stations should be moved or repositioned to increase distance.
- Limit delivery personnel to a designated area to maintain separation from office employees.

Additional Office Specific Precautions

- a. Assign dedicated entry point(s) for all employees to reduce congestion at the main entrance.
- b. Provide visual indicators of appropriate spacing for employees outside the building in case of congestion.
- c. Take steps to reduce entry congestion and to ensure the effectiveness of screening (e.g., by staggering start times, adopting a rotational schedule in only half of employees are in the office at a particular time).
- d. Require face coverings in shared spaces, including during in-person meetings and in restrooms and hallways.
- e. Increase distancing between employees by spreading out workspaces, staggering workspace usage, restricting non-essential common space (e.g., cafeterias), providing visual cues to guide movement and activity (e.g., restricting elevator capacity with markings, locking conference rooms).
- f. Turn off water fountains.
- g. Prohibit social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office.
- h. Provide disinfecting supplies and require employees wipe down their work stations at least twice daily.
- i. Post signs about the importance of personal hygiene.
- j. Disinfect high-touch surfaces in offices (e.g., copiers, restrooms, handles) and minimize shared items when possible.

- k. Institute cleaning and communications protocols when employees are sent home with symptoms.
- l. Notify employees if the employer learns that an individual (including a customer, supplier, or visitor) with a confirmed case of COVID-19 has visited the office.
- m. Suspend all nonessential visitors.
- n. Restrict all non-essential travel, including in-person conference events.

If an employee has a confirmed case of COVID-19, Company ensures the following:

- We will work to communicate with co-workers while maintaining privacy rights.
- We will work with our local health department to provide them with the name of any identified employees that may have been exposed.
- We will report cases to OSHA via their reporting/recordkeeping requirements.
- We will follow CDC and State guideline protocols for return to work, including workplace contact tracing and CDC-recommended cleaning and disinfecting in all affected areas.
- We will perform increased environmental cleaning and disinfection
 - Employees should sanitize their work areas upon arrival, throughout the workday, and immediately before leaving for the day.
 - We will all routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
 - After using a Company owned vehicle, employees are responsible for cleaning and disinfecting the vehicle.
 - Company provides disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, copiers, desks, other work tools and equipment) can be wiped down by employees before each use.
 - Eliminate/restrict work-related travel if possible and limit employees' exposure to employee who traveled until we can confirm traveling employee does not have COVID-19 symptoms.
 - Employees at a higher risk for serious illness due to COVID-19 will be encouraged to limit in-office hours and/or work remotely. If working remotely is not possible, additional precautions will be put in place to ensure their safety, including working in separate workspaces.
 - Monitor and respond to absenteeism.

Minimizing exposure from those outside of our workplace including customers, guests, suppliers and service providers

- Company business practices are evaluated to ensure safety and health of all individuals. This is done on a phased approach. Beginning with appointment only onsite meetings, virtual meetings and finally transitioning to onsite meetings with appropriate precautions when that time comes.
- Social distancing practices to be observed:
 - 6-foot distances are marked in areas where customers might gather/wait.
 - In person meetings are to be made by appointments only.
 - Limit the number of visitors allowed into workplace.

- Minimize face to face contact.
- Any individual entering Company's facility may have their temperature checked and/or a questionnaire completed prior to entry.
- Individual symptoms will be observed and individuals displaying symptoms of COVID -19 will be removed from the workplace.
- Company will provide masks to customers as well as appropriate disinfectants so that individuals can clean work areas before and after use.
- Information is posted throughout the worksite educating individuals on ways to reduce the spread of COVID-19
- All office deliveries will be limited to front office waiting area to maintain separation from office personnel.

This Plan is based on information and guidance from the CDC, OSHA and the State of Michigan at the time of its development. The safety of our employees and guests remain our top priority. We recognize that all individuals are responsible for preventing the spread of COVID-19 and for reducing the potential risk of exposure to our employees and guests. As the COVID-19 outbreak continues to evolve and spread, Company is monitoring the situation closely and will update our guidance accordingly.

State of Michigan Coronavirus information, including Executive Orders and Directives, may be found online at <https://www.michigan.gov/coronavirus/>.

Additional COVID-19 Resources:

- <https://www.cdc.gov/coronavirus/>
- <https://www.osha.gov/SLTC/covid-19/>
- <https://www.livgov.com/health/ph/Pages/COVID19.aspx>