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Purpose:

The purpose of this policy to document established guidelines for Cust-O-Fab (COF) employees or contractors who may be involved with emergency contingency planning activities. COF in general applies to all affiliates, COF, LLC and COF Specialty Services.

Scope:

The scope of this policy includes key contingency action items to consider during natural disasters, epidemics or other infectious disease that could impact normal operations. This plan should be used in conjunction with EH&S Section-14, Emergency Action Plan.

Contingency Planning Philosophy:

While each event may be unique in terms of location and severity, COF must be prepared to implement a variety of management activities to preserve employee welfare and maintain responsive operations.

Definitions:

Contingency- is defined as *a future event or circumstance which is probable but cannot be predicted with certainty.*

Epidemic- *means a sudden increase in the number of cases of a disease above what is normally expected.*

Pandemic- *means an epidemic that has spread over several countries or continents, usually affecting a large population.*

Exposure "Hot Spot"- *is defined as any geographical location with known natural disaster or cases of epidemic illnesses.*

Intra-Company Communication (ICC)- *is a proactive or reactive distribution either as a BOLO (be on the lookout) or during face-to-face safety meetings to communicate company awareness or instructions.*

Responsibilities:

In addition to general roles and responsibilities listed below, departmental response teams may be required to initiate pertinent threat-level action Items detailed in appendixes (1) and (2) of this policy.

Executive Management Team (i.e. CEO, CFO, VP's and the Director of EH&S) will conduct a thorough assessment, including continued monitoring as an event evolves in order to make well-timed decisions involving all business segments, client obligations and employee welfare. In addition, executive management will prepare and respond to all media requests, as applicable.

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Human Resources (HR) (i.e. HR Manager and Associates) will assist with medical privacy advise for HIPPA, ADA, etc. In addition, HR will:

- Verify and maintain an up-to-date employee call/contact list.
- Verify and maintain an employee designated emergency contact information.
- HR may also be asked to assist with employee wellbeing health screenings or coordinating fit-for -duty examinations.

Procurement Department (i.e. Director of Procurement and Associates) will make sure initial and continued contacts are made with suppliers to establish, at a minimum:

- Availability or predicted delays of manufacturing materials affected by an event
- Potential shipping or delivery Impacts.
- Procurement options to secure critical long-term delay items that could affect productivity.

Safety Department (i.e. Safety Director, Site Safety Manager, Project Safety Supervisor) will closely evaluate and monitor that status of unforeseen events, including any initial or continued affect that an event may have relative to their area of responsibility. The following include but may not be limited to:

- Revalidate inventory of safety consumables such as PPE, drinking water, first aid supplies.
- Maintain persistent communications with local emergency management agencies
- Make contacts with safety consumable suppliers to determine availability of personal protective equipment.
- Set up and maintain Onsite Health Screenings to monitor individuals for signs and symptoms of epidemic exposures, when applicable.
Note: This may include daily vital sign monitoring such as body temperature or other screenings.
- Develop contingent emergency evacuation plans, where applicable.

Travel Mitigation Plans:

Projects scheduled in an identified exposure “hot-spot” area requires a thorough assessment of that geographic location to determine that it is duly safe to place employees in that physical environment.

Note: The OSHA General Duty Clause, Section 5(a)(1) of the Occupational Safety and Health Act, requires that each employer furnish to each of its employees a workplace that is free from recognized hazards that are causing or likely to cause death or serious physical harm. Knowing placing any employee accordingly could be construed as a willful violation of the regulatory standard.

COF also HIGHLY encourages employees who will travel internationally, to sign up for the Smart Traveler Enrollment Program (STEP).

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Note: This is a free service for U.S. citizens and nationals who are traveling or living abroad. STEP allows you to enter information about trips abroad so that the Department of State, via our embassies and consulates, can better assist you in an emergency. You can also subscribe to receive email updates with travel advisories and other information for a particular country.

Work Assignment Limitations:

Under severe circumstances where co-worker or public safety is a concern, employees who display signs and symptoms of exposure to epidemic illnesses must not be allowed to remain at work.

Employees should be instructed to call the main office where they report if they have been diagnosed with an illness and not report to work until they have been cleared by a health professional.

Existing or new hire employees travelling from any known exposure “hot spot” locations will be placed on a 14-day waiting period prior to work assignment. This may include Fit-for-Duty Screening from a COF designated medical care provider, where appropriate.

Daily Health Screenings:

As a situation dictates, daily health screenings may be conducted by onsite safety or selected personnel. Due to proximity of these activities, **screening personnel must** wear specialized PPE (i.e. medical grade latex gloves and N-95 respirator) when performing these duties.

The screening process should be consistent with each employee and should include the following screenings:

- Have the employee sanitize hands and spray feet with disinfectant.
- Ask if the employee he/she, or a live-in family member is currently experiencing shortness of breath, extreme congestion, chills, abnormal sneezing or other flue like symptoms.
- Scan the employee’s forehead for signs of fever.

Individuals who show signs of a fever **equal to or greater than 100.5 degrees**, and or display **noticeable upper respiratory issues** MUST NOT be allowed to work. They will be advised to report to a healthcare professional for further evaluations and may not return to work until they have been fever-free for a full 24-hours.

Modified Staffing Plans:

There are several elements to consider when determining staffing needs during a crisis. The following should be considered, but may not be limited to:

- Decision whether employees stay home
- Essential positions required to continue work

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- School/daycare closings
- Viable recruiting pool for short-service employees

The following identifies anticipated staffing during emergency situations:

Office Staff: Under abnormal conditions, office staff ranks such as general management, procurement, human resources, sales, engineering, estimating, accounting and onboarding can successfully perform these duties at home for a tolerable time.

Manufacturing Facilities and Field Projects: These positions necessitate indirect frontline management and a direct workforce to maintain essential production, quality and safety. Careful planning for personal hygiene at work, home and public venues must be a continued focus point. As mentioned in the safety section, this may include individual daily health checks to mitigate the spreading of pandemic viruses in the workplace, where appropriate.

Media Coverage:

If by chance one of our facilities experiences a high case rate of COVID-19, it is possible that someone may be approached by a member of the media. If this occurs, it is important to respond; *I have no factual information at this time and refer them to our corporate office.*

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Appendix- 1 Epidemic and or Pandemic Illnesses Action Plans

This addendum identifies threat-level action items that may be necessary to mitigate the spread of flu and or coronavirus illnesses in the workplace.

Threat Level-1: General Precautions and Awareness *(i.e. Active outbreak of flu or coronavirus).*

Action Item	Control Measures	Responsibility
Education, Personal Hygiene Awareness	<ul style="list-style-type: none"> • Research imminent threat and generate ICC- BOLO to elevate personal awareness and hygiene. 	Safety Director, or Designee
Monitoring Status of Threat	<ul style="list-style-type: none"> • Continued study of existing threat • Monitor CDC informational data 	Executive Management Team (i.e. Safety Director, CEO, CFO, HR Manager)
Periodic Assessment Meetings	<ul style="list-style-type: none"> • As needed executive meetings to determine response efforts 	Executive Management Team (i.e. Safety Director, CEO, CFO, HR Manager)
Pro-active Cleaning/ Disinfecting	<ul style="list-style-type: none"> • ICC- BOLO advising enhanced cleaning efforts of offices, eating areas, breakrooms, etc. 	Safety Director, or Designee
Reporting Illnesses	<ul style="list-style-type: none"> • ICC-BOLO Instruct employees to report illnesses immediately and DO NOT report to work sick 	Safety Director, or Designee
Threat Committee Team	<ul style="list-style-type: none"> • Organize committee to initiate discussions for additional response efforts relevant to the threat location • Identify and assign roles and responsibilities 	Executive and Local Management (as applicable)

Threat Level-2: Pending Epidemic *(i.e. Abnormal number cases of flu or coronavirus with a potential to impact normal operations).*

Action Item	Control Measures	Responsibility
Enhanced Hygiene and Sanitation	<ul style="list-style-type: none"> • Coordinate enhanced cleaning and disinfecting of offices, breakrooms, restrooms, common area doors, office equipment 	Area General Manger, or Designee
Travel Mitigation Plans	<ul style="list-style-type: none"> • Screening Questionnaire for 	Onboarding, Human Resources, Safety Department

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	personnel who have travelled to/from known high-risk areas of reported illnesses <ul style="list-style-type: none"> • Implement 14-day hold prior to work assignment for all employees who have travelled to/from high risk exposure areas 	
Monitoring Status of Threat	<ul style="list-style-type: none"> • Continued study of existing threat, including CDC updates to executive management 	Executive Management Team (i.e. Safety Director, CEO, CFO, HR Manager)
General Visits from Sales Vendors	<ul style="list-style-type: none"> • Limit Vendor visits to essential business needs (i.e. critical quality inspection) 	General Manager, Sales, Procurement
Sanitation Stations	<ul style="list-style-type: none"> • Set up sanitation stations at office access points • Have all entrants spray soles of shoes with Lysol and wipe hands with sanitizer • Wait 60 seconds before leaving station 	Office Receptionists & Safety Department

Threat Level-3: Imminent Pandemic (*i.e. Wide-spread outbreak flu or coronavirus affecting large populations both mainland and internationally, with an imminent affect on normal operations*).

Action Item	Control Measures	Responsibility
Daily Health Screenings *See page-2 directives	<ul style="list-style-type: none"> • Conduct daily health vital signs screenings targeting 100% of office, shop and field employees: <ol style="list-style-type: none"> 1. Upper respiratory issues 2. Core temperature readings =/\leq100.5 degrees 	Safety Department, HR, Production Supervisors
Food Consumption Venues	<ul style="list-style-type: none"> • Cease Pot-luck luncheons • Cease food vendor trucks 	Intra-Company Communication-Safety Department, General Manager

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Business Segment Isolation	<ul style="list-style-type: none"> Secure access to facilities by closing access gates, where feasible Activate interlock features on magnetic access doors and elevators to control public access 	General Manager, Executive Assistant
Work Assignment Limitations	<ul style="list-style-type: none"> Employees who display signs or symptoms of illness will not be allowed to remain at work, and will be referred to their personal doctor for care 	Safety/Production/Project Managers
Modified Staffing Plans	<ul style="list-style-type: none"> Non-essential office staff may be assigned “work from home” status If practical, non-essential direct labor may be reduced to critical path work activities only 	VP, GM, PM
Monitoring Status of Threat	<ul style="list-style-type: none"> Continued CDC updates to executive management 	Executive Management Team (i.e. Safety Director, CEO, CFO, HR Manager)
Media Response (If contacted)	<ul style="list-style-type: none"> If we experience a significant number of illnesses, it is possible that the media will contact one of our facilities The Corporate Safety Director will normally be the point of contact 	Corporate Safety Director Note: If not available, contact the CEO, CFO

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Appendix -2 Flashflood Contingency Plan

The urgent concern with flash flooding is the unpredictable response time to safety evacuate personnel once flash flooding occurs. It is nearly impossible to project rising waters, traffic gridlocks, safe evacuation routes and timely rescue.

While not all COF locations have an imminent threat of flooding, history tells us that such an event cannot be ruled out. As such, COF must be prepared to preserve property and protect our employees when flash flooding is imminent. Above all, this plan must be executed with the preservation of life as the most essential priority.

Threat Level-1: General Precautions and Awareness (i.e. large rain event expected).

<i>Action Item</i>	<i>Control Measures</i>	<i>Responsibility</i>
Education and Awareness	<ul style="list-style-type: none"> Research imminent threat and generate ICC- BOLO to elevate personal awareness and evacuation procedures 	Safety Director, or Designee
Monitoring Status of Threat	<ul style="list-style-type: none"> Continued Monitoring of state and local emergency management advisories, 	Executive and Affected Business Segment GM
Periodic Assessment Meetings	<ul style="list-style-type: none"> As needed executive meetings to determine potential response efforts such as relocating equipment or personnel, staging equipment at elevated surfaces 	Executive Management Team (i.e. Safety Director, CEO, CFO, HR Manager)
Threat Committee Team	<ul style="list-style-type: none"> Organize committee to initiate discussions for additional response efforts relevant to the threat location Identify and assign roles and responsibilities 	Executive and Local Management (as applicable)

Threat Level-2: Pending Flood (i.e. elevated water levels, possible levee breach with a potential to impact normal operations).

<i>Action Item</i>	<i>Control Measures</i>	<i>Responsibility</i>
Emergency Evacuation Plan	<ul style="list-style-type: none"> Coordinate and Communicate Evacuation Plans, including primary and secondary evacuation routes 	Safety Department, Area General Manger or Designee,

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Equipment, Materials and Personnel	<ul style="list-style-type: none"> Consider the need to relocate vehicles and tools trailers to higher ground Store Material and Welding Machines on elevated surfaces Relocate non-essential personal to alternate offices, or work from home status 	Onboarding, Human Resources, Safety Department
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Threat Level-3: Imminent Flooding (i.e. local warnings activated, facility flooding likely).

Action Item	Control Measures	Responsibility
Vehicles & Equipment	<ul style="list-style-type: none"> Execute relocation plans of vehicles, tool trailers 	All available personnel
Staffing	<ul style="list-style-type: none"> Reduce or relocate staff and workforce to essential personnel 	Executive Management
ENS (Emergency notification systems)	<ul style="list-style-type: none"> Preparedness to activate applicable ENS to alert workers 	Area Supervisor or others
Controlled Evacuation		
Alarms & Notification	<ul style="list-style-type: none"> Activate ENS and notify upline management Shut down equipment Account for and release workforce, if instructed 	Area Supervisor or others
Utilities	<ul style="list-style-type: none"> If safe to do so, isolate main utilities, building gas supply by closing predesignated main shutoff valves and electrical disconnects (i.e. natural gas, argon, oxygen, electric). 	Safety, GM, Area Supervisor
Security	<ul style="list-style-type: none"> Lock facility premises Stage personnel to monitor remote storage lots, etc. 	Area Supervisor
Life Critical Evacuation		
Severe Flooding that compromises human life	<ul style="list-style-type: none"> Sound all hands evacuation Proceed via predetermined safe route to assembly point 	Area Supervisor, Safety, other

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	<ul style="list-style-type: none"> Account for all personnel Release workforce Report accountability to upline management 	
Media Response (If contacted)	<ul style="list-style-type: none"> If we experience a significant number of illnesses, it is possible that the media will contact one of our facilities The Corporate Safety Director will normally be the point of contact 	Corporate Safety Director Note: If not available, contact the CEO, CFO

Note: While flood data is referenced from federal and local emergency planning agencies, COF considers this information to be academic in nature. At no time shall any member of COF management delay emergency response or evacuations based on probable timelines.

COF reserves the right to adjust threat levels or response efforts as needed, at any time, with or without advance notification.

Revision/Approval Log:

Rev. No.	Date:	Action:	By:
0		Original Issue	