



## **DWM Holdings COVID-19 Preparedness and Response Plan**

DWM Holdings, Inc., and each of its subsidiaries and sister companies, including but not limited to United Lighting Standards, General Structures, Inc., and Lyte Poles (all hereinafter collectively referred to as the “Company”), takes seriously its role as a critical infrastructure business and its obligations under Michigan Governor Gretchen Whitmer’s Executive Order 2020-42, pertaining to “Temporary requirement to suspend activities that are not necessary to sustain or protect life,” also known as the “Stay Home, Stay Safe” order (the “Order”). Moreover, the Company takes very seriously its role in providing a safe and healthy workplace for team members and customers.

Consistent with and pursuant to Paragraph 10 of the Order, the Company has developed, adopted, and implemented this COVID-19 Preparedness and Response Plan (the “Plan”). The Plan is consistent with the Occupational Safety and Health Administration’s recommendations in its Guidance on Preparing Workplaces for COVID-19. This Plan is also consistent with the mandates and regulations in the Order. The Plan will be available at all Company locations and/or worksites where in-person team members will be present for work.

This Plan shall have the effective date of April 13, 2020 and shall be in effect at least so long as the Order is in effect or any subsequent executive order that takes its place, mandating such a Plan. At the end of such time, the Company will reevaluate this Plan and determine whether to extend it, continue its implementation, or to make appropriate changes.



This Plan is the Company's best efforts at doing its part to reduce and mitigate the spread of the COVID-19 virus and to provide a safe and healthy workplace. Nothing in this plan, however, shall constitute or be construed as providing any beneficiary rights or privileges—directly or as third-party beneficiaries—to any individuals. The Company may have other policies in addition to those herein that it may also implement or recognize when and where appropriate and this plan may be revised or amended, in writing or otherwise, as necessary or appropriate, at the Company's discretion. This Plan, however, reflects the Company's best efforts to comply with all applicable laws, regulations, and orders.

### **Social Distancing Practices and Measures**

For at least the duration of the Stay Home Order, the Company hereby adopts and will implement the following Social Distancing Practices and Measures for all team members, customers, and any other person who should for any reason be present on Company property:

- The Company will restrict the number of team members present on premises to no more than is strictly necessary to perform the Company's critical infrastructure functions and/or the Company's minimum basic operations.
- The Company has already designated its critical infrastructure workers and minimum basic operations workers. Only those designated team members may be present on Company premises, and only for the purpose of fulfilling their work as so designated.
- For all other workers, the Company implemented a Work from Home policy and promoted remote work to the fullest extent possible.
- Any persons on the Company's premises are to be kept at least six feet from one another to the maximum extent possible. It is recognized that the nature of the work that the Company performs may not always allow for such distancing at all times. But to the extent such distancing can be followed, it shall be.



- The Company is taking all steps practical and possible to increase the standards of its facility's cleaning and disinfection in order to limit worker and patron exposure to COVID-19, as well as adopting protocols to clean and disinfect in the event of a positive COVID-19 case in the workplace. These steps are being carried out by in-house personnel, contracted housekeeping and janitorial services, and/or by specialty contractors who specialize in disinfecting premises after a COVID-19 case has been identified on premises, in accordance with the CDC guidelines.
- Through use of the Team Member COVID-19 Self Disclosure Form contained in this Plan, as well as through other means, the Company has adopted policies to prevent workers from entering the premises if they have had contact with a person with a confirmed diagnosis of COVID-19.
- The Company will continue to follow any other social distancing practices and mitigation measures recommended by the CDC, to the extent feasible.

### **Infectious Disease Preparedness and Response Plan**

In order to be prepared to protect our team members and to respond in case there is any identification or confirmation of any COVID-19 exposure in our workplace, the Company adopts the following policies or guidelines in an attempt to prepare for and respond to any potential exposure.

- The Company will continue to strive to determine where and how workers may be exposed to COVID-19. Areas of high public use such as door handles, knobs, or bars; bathrooms; and any common areas of ingress or egress will be routinely and frequently cleaned and/or disinfected.
- The Company will consider individual workers' individual risk factors, to the extent they are known or made known to the Company and will strive to meet any particular or individualized risk concerns.
- Only designated critical infrastructure workers and minimum basic operation workers are permitted to work in-person on Company premises.

The Company has been in contact with suppliers and service providers, designated those that are critical to the company's work, attempted to



identify backup suppliers and continues to communicate with those downstream in the supply chain to attempt to ensure continued operations.

### **Implementation of Basic Infection Prevention Measures**

In an attempt to foster a safe and hygienic workplace and work experience, the Company is promoting and encouraging all persons on Company premises to abide by the following basic infection prevention measures:

- Every individual should engage in frequent and thorough hand washing, using soap and water, and washing his or her hands for at least twenty (20) seconds. The Company will provide every person on its premises with a place to wash their hands and will provide soap and running water. Whenever possible and feasible—and at any time when for whatever reason water and soap is not available—the Company will provide alcohol-based disinfectant or hand rubs.
- The Company has informed and encouraged all workers to stay home if sick or if they know they have been in contact with someone else who has contracted COVID-19.
- All team members are encouraged to use respiratory etiquette, including coughing and sneezing into the interior of their elbows whenever possible.
- All team members are encouraged and directed not to shake hands or hug coworkers or other individuals.
- The Company will strive to provide team members (and to the extent applicable, customers and the public) with tissues and trash receptacles.
- All team members are prohibited from using another worker's phone(s), desk(s), office(s), or other work tools and equipment, whenever possible.
- The Company will maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.



- The Company will strategically place signage to promote frequent handwashing, mindfulness specific to limiting face touching, and social distancing of 6' separation whenever possible.

### **Policies and Procedures for Prompt Identification of COVID-19**

The Company understands that despite the best practices, preparation, and planning, and due to no fault of the Company or others, it is possible that a team member could become sick and/or show symptoms of COVID-19. Such occurrences could occur because a team member contracted the virus off-premises and away from work, but inadvertently brought it to the workplace. In order to act promptly for the sake of the sick team member or individual and for the sake of all others, the Company will implement and carry out the following plans and procedures:

- The Company encourages team members to self-monitor for signs and symptoms of COVID-19, especially if they suspect possible exposure, and to report same.
- Any person who has had a confirmed case of COVID-19 will be directed that they may not return to work for at least 14 days.
- If any person who has been on premises within the preceding 7 days is found out to have had COVID-19, the Company will close off the areas of the workplace used by the person who is sick and will clean and disinfect all areas used by the person who is sick, such as offices, bathrooms, common areas, tools, shared electronic equipment like tablets, touch screens, keyboard, and remote controls.

### **Workplace Controls**

In an attempt to provide the safest and healthiest workplace atmosphere possible, the Company has implemented or will strive to implement the following workplace controls:

- *Administrative Controls*
  - The Company seeks to minimize contact among workers, clients, and customers by replacing face-to-face meetings with virtual communications and implementing telework wherever feasible.
  - The Company has informed team members that it is discontinuing all non-essential travel.



- The Company is requiring all visitors to be pre-approved prior to their visitation date.
  
- The Company will provide on-going communication and encourages all team members to voice their questions and concerns via Microsoft Teams, phone, and/or e-mail.
  
- *Safe Work Practices*
  - The Company strives to provide resources and a work environment that promotes personal hygiene. For example, the Company will provide tissues, no-touch trash cans, hand soap, alcohol-based hand rubs, disinfectants, and disposable towels, whenever such resources or supplies are available.
  - The Company promotes regular hand washing and disinfecting.
  - The Company will post handwashing signs in all restrooms, reminding team members and others on Company premises of their obligations for personal hygiene.
  
- *Personal Protective Equipment (PPE)*
  - Whenever possible and when deemed necessary for a team member's work, the Company will make available to team members the following, when appropriate and when possible given supply: gloves, goggles, face shields, face masks, and respiratory protection.



### **Team Member COVID-19 Self Disclosure Form**

This form is intended to provide information for use in making decisions relating to the COVID-19 crisis and is not intended to be used as a medical examination or be used for purposes of making a diagnosis.

Please fill out the below questions and return to Natalie Nezych, Human Resources Manager, [natalien@polemfg.com](mailto:natalien@polemfg.com).

**Have you had close contact with a confirmed or probable COVID-19 case?**

Yes \_\_\_\_\_

No \_\_\_\_\_

If yes, was the case confirmed? Yes \_\_\_\_\_

No \_\_\_\_\_

Please explain:



**EMPLOYEE AUTHORIZATION  
To Disclose COVID-19 Diagnosis**

I understand that the Americans with Disabilities Act, the Family and Medical Leave Act, and other privacy laws prohibit my employer from disclosing my medical/health information. In the interest of the health of my co-workers and others with whom I may have had contact on my worksite, however, I authorize DWM Holdings, Inc. (the “Company”) to disclose to team members at my worksite and to others, i.e., clients, visitors, customers, whom I may have encountered at my worksite, that I have tested positive for the COVID-19 virus or that I have been exposed to the virus.

The Company advised me that I am not required to do so and that there would be no adverse consequences to my employment if I chose not to do so. Further, the Company did not seek to coerce or pressure me to permit the disclosure.

\_\_\_\_\_  
Signature of individual

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed name of the individual

**SIGNING THIS AUTHORIZATION FORM IS VOLUNTARY**