

**MADSEN ROOFING & WATERPROOFING, INC.
COVID-19 PREVENTION PROGRAM**

This COVID-19 Prevention Program (“CPP”) is designed to control exposures to COVID-19 that may occur in the workplace. The CPP shall remain in place until 8 CCR § 3205 is no longer effective. This CPP may be amended based on legal developments.

AUTHORITY AND RESPONSIBILITY

Rosemary Reynolds has overall authority and responsibility for implementing the provisions of this CPP for Madsen Roofing and Waterproofing, Inc. (“Madsen”). All employees are responsible for using safe work practices, following all directives, policies and procedures, and assisting in maintaining a safe work environment. Employees may be disciplined for failing to follow these directives, policies, and procedures.

SYSTEM FOR COMMUNICATING

We will communicate with employees about COVID-19 in the workplace in a form readily understandable by employees, and will cover the following topics:

- Ask employees to report COVID-19 symptoms, possible COVID-19 exposures, and possible COVID-19 workplace hazards. Assure employees that these reports can be made without fear of reprisal.
- The procedures or policies that we have for accommodating employees with medical or other conditions putting them at increased risk of severe COVID-19 illness.
- We do not provide COVID-19 testing in the workplace, but we will, if necessary, inform employees where they can receive COVID-19 testing. We will pay for testing required by this CPP or otherwise required by us, and such testing will take place during the employees’ working hours. We will tell affected employees why the testing is needed and the possible consequence of a positive test, such as quarantine, and will provide information on benefits as set forth in the “Investigating and Responding” Section of this CPP.
- Employees exposed to COVID-19 will be notified as described in the “Investigating and Responding” Section of this CPP. They will be told about COVID-19 hazards and workplace polices when there is potential COVID-19 workplace exposure. This communication extends to employees and other employers, persons, and other entities in contact with the workplace.

PERSONAL PROTECTIVE EQUIPMENT

- The need for personal protective equipment to prevent COVID-19 exposure (i.e. gloves, goggles) and respiratory protection when physical distancing is not feasible, will be evaluated and provided, as needed. Proper use of this equipment will be required if deemed necessary.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS

- Employees may participate in identifying and evaluating COVID-19 hazards in the workplace by doing things like reporting COVID-19 issues they observe, such as when they have symptoms.
- Employees must self-evaluate for COVID-19 symptoms prior to coming to work and remain home if they exhibit symptoms.
- We have developed policies and procedures in order to respond effectively and immediately when an employee at the workplace is already infected with COVID-19, such as sending the employee home, disinfecting affected areas, and following other CDC guidance.
- All interactions, areas, activities, processes, equipment, and materials that could potentially expose others to infection in the workplace will be identified for each specific workplace, using the assumption that all persons are potentially infected, regardless of symptoms or negative COVID-19 test results. Once these items are identified, they will be evaluated and corrective steps taken. This includes:
 - Identifying places and times when people come into contact with each other, irrespective of whether they are performing work duties (i.e. bathrooms, break rooms, hallways, entrances); and
 - Evaluating employees' potential workplace exposure or those in the workplace like coworkers, vendors, clients, and customers, being mindful of how these persons travel in the workplace, in addition to fixed work locations.
- We will evaluate the ability to maximize outdoor air quantity and whether it is possible to increase filtration efficiency to the highest level compatible with the existing ventilation system.
- Applicable COVID-19 orders and guidance from the State of California and from local health departments will be reviewed and the appropriate steps taken. This review will include guidance for general application and for Employer's specific industry.
- Existing COVID-19 prevention controls will be reviewed to determine if additional or different controls are needed.
- Periodic inspections will be conducted, as needed, to identify and correct unhealthy COVID-19 conditions, work practices, and work procedures, in addition to ensuring compliance with COVID-19 policies and procedures.

INVESTIGATING AND RESPONDING TO COVID-19 CASES IN THE WORKPLACE

The following steps will be taken by us when there is a COVID-19 case in the workplace.

- Infected employee(s) will be consulted about their COVID-19 case status. We will request information about test results and symptom onset. We will also have an effective procedure for identifying and recording COVID-19 cases.
- To the extent possible, we will:
 - Determine the date and time the infected person was last present at work;
 - Date of the positive COVID-19 tests(s) and/or diagnosis;
 - Date the infected person first had symptoms, if any;
 - Determine who may have had COVID-19 exposure by reviewing the infected employee’s work activities and work locations they visited during their high-risk exposure period;¹
 - Give the following people notice of potential COVID-19 exposure, within one business day, and without revealing identifying information:
 - i) Employees who may have had COVID-19 exposure; and
 - ii) Independent contractors and other employees present at the workplace during the high-risk exposure period.
 - Employees potentially exposed at work are offered, during work hours, COVID-19 testing and informed about relevant benefits information.
 - Investigate if workplace conditions contributed to the COVID-19 exposure and take corrective steps.
- Unless otherwise required, confidentiality of persons with COVID-19 or COVID-19 symptoms will be kept, including their related medical information.

CORRECTION OF COVID-19 HAZARDS

- Prompt corrective action will be taken when it is determined that unsafe or unhealthy conditions related to COVID-19 exist in the workplace. This includes when hazards identified by the “Identification and Evaluation of COVID-19 Hazards” Section of this CPP are identified. The severity of the hazard will dictate response time.

PHYSICAL DISTANCING

- Employees will be separated from others by at least six feet, except when not possible and when there is only momentary exposure while persons are in movement. Individuals shall be as far apart as possible when six feet of physical distancing is not possible.

Methods to ensure physical distancing can including reducing people in an area, telephone or video conferences in lieu of in person meetings when possible, and staggering breaks.

¹ “High-risk exposure period” means:

(A) For infected person with symptoms: from two days before they first develop symptoms until 10 days after symptoms first appeared, and 24 hours have passed with no fever, without the use of fever-reducing medications, and symptoms have improved;

(B) For infected persons without symptoms: from two days before, until ten days after, the specimen for their first positive test for COVID-19 was collected.

TRAINING AND INSTRUCTION

Employees will be trained on the following topics:

- COVID-19 policies and procedures to protect employees.
- Information about COVID-19 related benefits employees may be entitled to under federal, state, or local laws, including workers' compensation, paid sick leave, and internal leave policies.
- COVID-19 is an infectious disease that can be:
 - Spread through the air when an infectious person talks or vocalizes, sneezes, coughs, or exhales;
 - Transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth; and
 - Infectious persons may be asymptomatic.
- The importance of six feet of physical distancing and combining physical distancing and face coverings.
- Physical distancing must be combined with other controls like face coverings and hand hygiene to be effective because particles containing the virus can travel more than six feet, especially indoors.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when there is no immediate access to hand washing facilities, and that sanitizer is ineffective if hands are soiled.
- Proper use of face coverings and that face coverings are not respiratory protective equipment.
- COVID-19 symptoms, the importance of not coming to work with symptoms, and the importance of getting COVID-19 testing in such circumstances.

FACE COVERINGS

- Employees will be given face coverings, if necessary, and they must be properly worn over the nose and mouth when:
 - Indoors.
 - Outdoors when six feet of physical distancing is not maintained.
 - When otherwise required by the California Department of Public Health or local health department.
- Face coverings must be clean and undamaged. Face shields are not a replacement for face coverings, although they can be worn together for additional protection.
- Face coverings need not be worn when:
 - An employee is alone in a room;
 - When employees are eating or drinking, provided they are at least six feet apart, and outside air supply to the area, if indoors, is maximized to the extent possible;
 - Appropriate respiratory protection is worn;
 - Face coverings cannot be worn due to a medical or mental health condition or disability, or the employee is hearing-impaired or communicating with a hearing-impaired person. Such individuals shall wear an effective non-restrictive alternative, such as a face shield with a drape on the bottom, if possible; and
 - An employee is performing a task which cannot be feasibly performed with a face covering. This exception only applies when the task is being performed, and employees must be at least six feet away from all other persons unless unmasked employees are tested for COVID-19 at least twice weekly.

- Employees not wearing a face covering, face shield or other effective alternative, or respiratory protection, for any reason, shall be at least six feet apart from other persons unless the unmasked employee is tested for COVID-19 at least twice weekly. COVID-19 testing cannot be used as an alternative to face coverings when face coverings are required herein.
- Employees can wear a face covering when not otherwise required herein, unless it creates a safety hazard.
- Non-employees will be told of these face covering requirements, either verbally or in writing, if they are not already abiding by these requirements.
- We will develop policies and procedures to minimize employee exposure to COVID-19 hazards originating from any person not wearing a face covering, including members of the public.
- Employees can report any non-compliance with this Section to management so appropriate remedial measures can be taken.

OTHER ENGINEERING AND ADMINISTRATIVE CONTROLS, AND PERSONAL PROTECTIVE EQUIPMENT

- Outside air will be maximized to the extent feasible, except when the Environmental Protection Agency Air Quality Index is greater than 100 for any pollutant or outside air causes a hazard, such as excessive heat or cold.
- The following cleaning and disinfecting steps are used so as not to create an employee hazard:
 - Frequently touched surfaces and objects are identified and regularly cleaned and/or disinfected. Employees are informed about these steps, including planned frequency, and scope of regular cleaning and disinfecting.
 - Employees cannot share personal protective equipment and items that employees come into regular contact with (i.e. phones, tools, instruments), to the extent feasible. Sharing shall be minimized and items and equipment will be disinfected between users when these limitations are not feasible.
 - The sharing of vehicles shall be minimized to the extent feasible, and high touch points, such as steering wheels and seatbelt buckles, shall be disinfected between users.
 - Areas, materials, and equipment used by those infected with COVID-19 during their high-risk exposure period shall be cleaned and disinfected.
- Employees are allowed time for handwashing, are encouraged to wash for at least 20 seconds, and are provided effective hand sanitizer (without methyl alcohol), subject to availability. Handwashing facilities will be evaluated to decide if more facilities are needed.

REPORTING, RECORDKEEPING, AND ACCESS

- Workplace COVID-19 cases will be timely reported to the local health department when required by law, in addition to related information requested by that department.
- Workplace COVID-19 cases will be timely reported to the Division of Occupation Safety and Health (the “Division”), when defined as “serious” by 8 CCR § 330.
- Records showing implementation of the CPP will be maintained for at least one year.
- This CPP is immediately available, upon request, at the workplace to employees and the Division.

- All workplace COVID-19 cases will be tracked and recorded, with medical information kept confidential. These records will be available to employees, [authorized employee representatives], and as otherwise required by law, with personal identifying information excluded. These records shall include:
 - Employee’s name;
 - Contact information;
 - Occupation;
 - Location where the employee worked;
 - Last day in the workplace; and
 - Date of positive COVID-19 case, if applicable.

EXCLUSION OF COVID-19 CASES

Nothing in this Section limits any other applicable law or employer policy that provides greater protections.

- Employees infected with COVID-19 will be excluded from the workplace until the “Return to Work Criteria” in this CPP are satisfied.
- Employees with COVID-19 exposure will be excluded from the workplace for 14 days after the last known exposure to a COVID-19 infected person. This period of time may be shortened to the extent it exceeds the longer of the applicable quarantine period recommended by (i) the California Department of Public Health or (ii) a local health officer with jurisdiction over the workplace.²
- Employees who have not been excluded or isolated by the local health department will not be excluded if they are temporarily reassigned to work where they do not have contact with other persons until the “Return to Work Criteria” below are met.
- Employees excluded from work under this Section, and otherwise able and available to work, will have the following workplace benefits continued and maintained through the exclusion period, subject to the exceptions below:
 - Employee’s earnings;
 - Seniority;
 - All other employee rights and benefits, including the employee’s right to their former job status, as if the employee had not been removed from their job;
 - Employer-provided sick leave benefits and other benefit payments from public sources may be used in determining how to maintain earnings, rights and benefits, where permitted by law and when not covered by workers’ compensation;
 - Excluded employees will be informed about these benefits in addition to the benefits described in the “Training and Instruction” Section of this CPP; and
 - These requirements do not apply to any time period when the employee is unable to work for reasons other than protecting persons at the workplace from possible COVID-19 transmission, nor does it apply where the COVID-19 exposure is not work related.

² “COVID-19 exposure” means being within six feet of a COVID-19 infected person for a cumulative total of 15 minutes or greater in any 24-hour period within or overlapping with the high-risk infection period of the infected employee. The use of face coverings does not determine whether such exposure occurred or not.

RETURN TO WORK CRITERIA

- Employees infected with COVID-19 who have symptoms cannot return to work until:
 - At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;
 - COVID-19 symptoms have improved; and
 - At least 10 days have passed since COVID-19 symptoms first appeared.
- Employees infected with COVID-19 who are asymptomatic cannot return to work until:
 - A minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.
- A negative COVID-19 test will not be required for an employee to return to work.
- If an order to isolate or quarantine an employee is issued by a local or state health official, the employee shall not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period shall be 10 days from the date the order to isolate was effective, or 14 days from the time the order to quarantine was effective.
- If there are no violations of local or state health officer orders for isolation or quarantine, then the Division may, upon Madsen’s request, allow employees to return to work on the basis that the removal of an employee would create undue risk to a community’s health and safety. In such cases, effective control measures will be developed and implemented to prevent COVID-19 transmission in the workplace such as isolating the employee or, alternatively, use of respiratory protection in the workplace.

MULTIPLE COVID-19 INFECTIONS AND COVID-19 OUTBREAKS

This Section of the CPP applies during an outbreak, which occurs if the local health department identifies the worksite as a COVID-19 outbreak location, or when there are three or more COVID-19 cases within the workplace within a 14-day period. This Section will stay in effect until there are no new COVID-19 cases detected in the workplace for a 14-day period.

Testing

- COVID-19 testing will be provided to all employees in the exposed workplace except for employees who were not present during the outbreak. COVID-19 testing will be provided at no cost to employees during employees’ working hours.
- COVID-19 testing consists of the following:
 - All exposed employees will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by the local health department.
 - After the first two COVID-19 tests, COVID-19 testing will continue to be provided to employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in the workplace for a 14-day period.
 - Additional testing when deemed necessary by Cal/OSHA.

Exclusion

- Those infected with COVID-19 and those with COVID-19 exposure will be excluded from the workplace in accordance with the “Exclusion of COVID-19 Cases” and “Return to Work Criteria” Sections in this CPP, and local health officer orders, if applicable.

Investigation

- An immediate investigation will be launched to determine possible workplace-related factors that contributed to the outbreak in accordance with the “Investigating and Responding to COVID-19 Cases” Section of this CPP.
- In addition to the “Identification and Evaluation of COVID-19 Hazards” and “Correction of COVID-19 Hazards” Sections in this CPP, potentially relevant COVID-19 policies will be reviewed to determine if changes are needed to prevent further spread of COVID-19.
- The investigation and review will be documented and include findings of new or unabated COVID-19 hazards including:
 - Leave policies and practices and whether employees are discouraged from remaining home when sick.
 - COVID-19 testing policies.
 - Insufficient outdoor air supply.
 - Insufficient air filtration.
 - Lack of physical distancing.
- This review will be updated:
 - Every 30 days that the outbreak continues.
 - In response to new information or to new or previously unrecognized COVID-19 hazards.
 - When otherwise necessary.
- When implementing changes to reduce the transmission of COVID-19 based on the investigation and review, the following will be considered:
 - Moving indoor tasks outdoors or having them performed remotely.
 - Increasing outdoor air supply when work is done indoors.
 - Improving air filtration.
 - Increasing physical distancing as much as possible.
 - Respiratory protection.

Local Health Department Notifications

- The local health department will be contacted immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in the workplace, for guidance on preventing the further spread of COVID-19 within the workplace.
- The local health department will be provided with the total number of COVID-19 cases, and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, the North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at the workplace.

MAJOR COVID-19 OUTBREAKS

This section of the CPP applies during a major outbreak, which occurs when the workplace experiences 20 or more COVID-19 cases within a 30-day period. This Section will stay in effect until there are no new COVID-19 cases detected in the workplace for a 14-day period.

Testing

- COVID-19 testing will be provided twice a week, or more frequently if recommended by the local health department, to all employees present at the exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion

- Those infected with COVID-19 and those with COVID-19 exposure will be excluded from the workplace in accordance with the "Exclusion of COVID-19 Cases" and "Return to Work Criteria" Sections in this CPP, and local health officer orders, if applicable.

Investigation

- The "Investigating and Responding to COVID-19 Cases" Section of this CPP will be followed.

COVID-19 Hazard Correction

In addition to following the "Correction of COVID-19 Hazards" Section of this CPP, the following actions will be taken in the case of a major outbreak:

- In buildings or structures with mechanical ventilation, recirculated air will be filtered with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, filters will be used with the highest compatible filtering efficiency. It will also be evaluated whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems, would reduce the risk of transmission and implement their use to the degree feasible.
- The need for a respiratory protection program to address COVID-19 hazards will be determined.
- It will be evaluated whether to halt some or all operations at the workplace until COVID-19 hazards have been corrected.
- Any other control measures deemed necessary by Cal/OSHA will be implemented.

Local Health Department Notifications

The requirements of the "Multiple COVID-19 Infections" in this CPP will be followed, including those about local health department notifications.