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1. Purpose

This document describes the plan of Riggs Distler & Company, Inc. (RDC) for dealing with the potential coronavirus (Covid-19) and sets the requirements for pandemic preparedness. The purpose of this plan is to protect the company's employees and also to ensure business continuity in the event of a pandemic. The plan will be updated as warranted.

2. Application

This plan applies to all RDC employees.

All local and national laws and regulations shall always be complied with. If anything in this PLAN conflicts with such local or national statute, the later shall prevail. All pandemic committee members will be notified in writing of the conflict and necessary correction taken to the plan in complying with the local and national laws or regulations.

3. Pandemic Preparedness Committee

RDC Pandemic Preparedness Committee (PPC) will consist of the following members:

Contact	Title	Office Phone	Cellular Phone
Steve Zemaitatis, Jr	President & CEO	856-433-6006	610-637-0495
Al Fosbenner	CFO	856-536-3823	610-331-5613
SuayMira Tasci	Senior Director, Human Resources	856-433-6277	267-441-7823
Richard Neill	EH&S Senior Director	856-433-6260	484-571-5207
Ed Milukas	Compliance Director	610-872-8896	267-236-2879
Kenneth McKay	VP Legal	856-536-3826	609-941-5816
Jason McKay	CIO	856-685-9476	860-597-6960

This committee will be responsible for continued development of this plan and implement actions needed during the different stages of a pandemic.

4. Pandemic Levels and Escalation

This plan refers to the WHO (World Health Organization) definition of Pandemic Levels as basis for escalation and triggering activities.

Inter-pandemic Period	
Level 1	No new virus subtypes have been detected in humans. A virus subtype that has caused human infection may be present in animals. If present in animals, the risk of human infections or disease is considered to be low.
Level 2	No new virus subtypes have been detected in humans. However, a circulating animal influenza virus subtype poses a substantial risk of human disease.
Pandemic Alert Period	
Level 3	Human infection(s) with a new virus subtype. No human-to-human spread or at most rare instances of spread to a close contact.
Level 4	Small cluster(s) with limited human-to-human transmission. Spread is highly localized, suggesting that the virus is not well adapted to humans.
Level 5	Larger cluster(s) but human-to-human spread still localized, suggesting that the virus is becoming increasingly better adapted to humans, but may not yet be fully transmissible (substantial pandemic risk).
Pandemic Period	
Level 6	<p>*Pandemic: increased and sustained transmission in general population.</p> <p>* Due to the declared Pandemic affecting our local communities and geographical areas where we conduct our work, the Riggs Distler & Company, Inc. Pandemic Preparedness Committee has directed that Level 6 Actions go into effect immediately. Please reference the Level 6 Actions found on Page 15 of this document for actions to be taken.</p>

5. Employee Awareness

Employee education is also a vital part of pandemic preparedness.

Early in the pandemic alert period, the scientific and technical aspects of a pandemic should be communicated to staff. This includes answering the following questions:

- What is Corona Virus (COVID-19)? How it is transmitted? How can it be prevented?
- What is the company doing to protect me? What contingency plans are being made?

As the pandemic progresses, staff will be regularly updated. Each staff member will be aware of the role they will play during a pandemic, and know when and how to respond.

6. Monitoring and Communication

6.1 Monitoring

All PPC members shall be responsible for monitoring and obtaining the most current information regarding the current Coronavirus and other potential pandemic from sources such as:

- WHO - <http://www.who.int/en/>
- CDC - <https://www.cdc.gov/coronavirus/2019-ncov/index.html>
- CDC - <https://www.cdc.gov/coronavirus/2019-ncov/downloads/sick-with-2019-nCoV-fact-sheet.pdf>

All EH&S and HR Staff also have an obligation to monitor the local and national press, radio, TV or other available media for any updated information with regards to trends and/or changes to current Coronavirus (COVID-19) strain, with feedback to any PPC member in a timely manner.

6.2 Communication

Ed Milukas is responsible for timely updating all RDC employees with current Coronavirus (COVID-19) and pandemic information and guidance, travel advisories and any specific actions from this plan that need to reach all employees.

Communications will be drafted by Ed Milukas and will cover the following topics:

- Cough etiquette
- Managing a Coronavirus (COVID-19) case at home
- Self screening

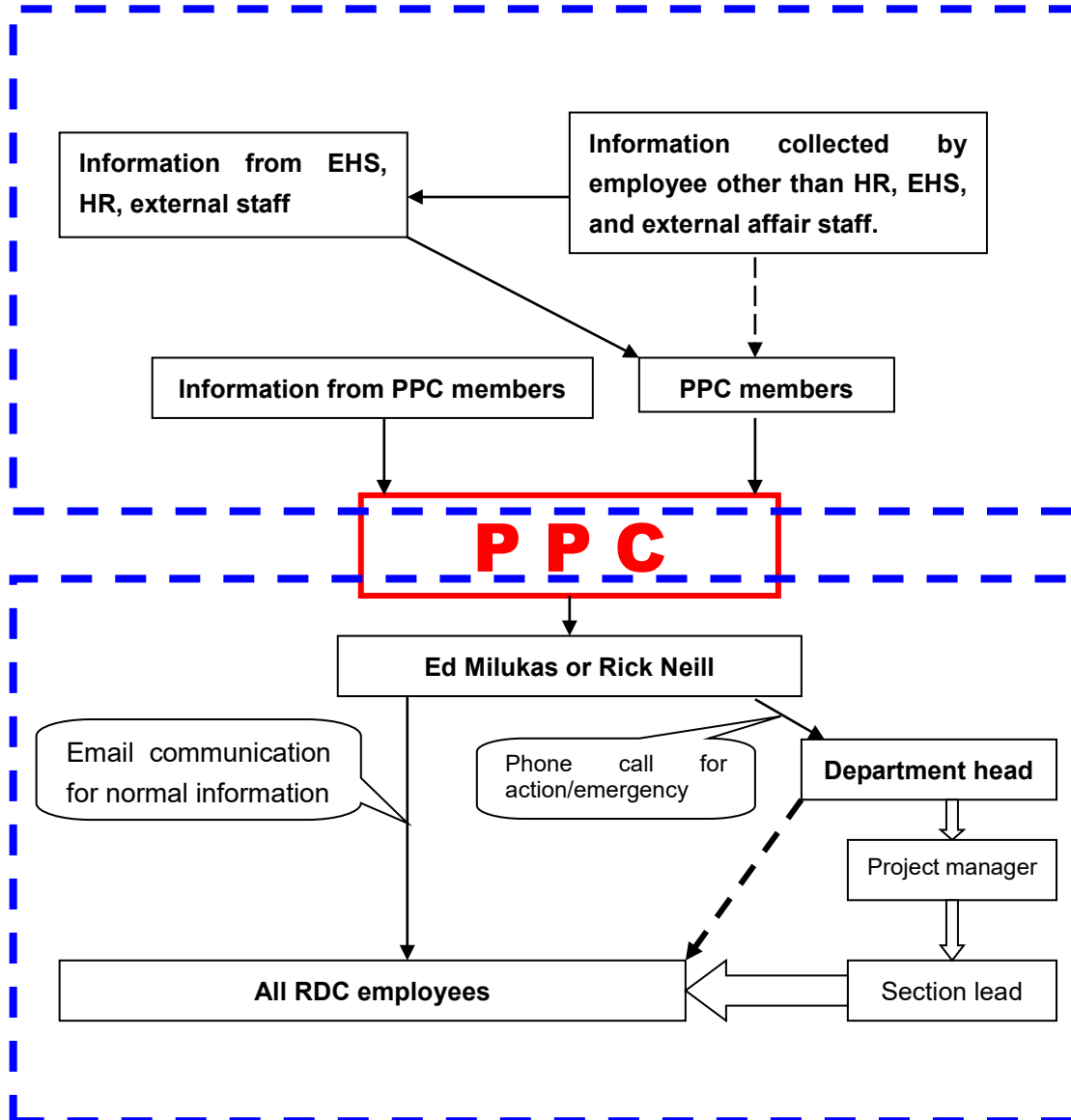
Fact Sheet Posters to be used:

<https://www.cdc.gov/coronavirus/2019-ncov/downloads/2019-ncov-factsheet.pdf>

<https://www.cdc.gov/coronavirus/2019-ncov/downloads/sick-with-2019-nCoV-fact-sheet.pdf>

<https://www.cdc.gov/coronavirus/2019-ncov/downloads/stop-the-spread-of-germs.pdf>

Communication Diagram



A contact list consists of all RDC employees with all reachable contact channels (such as the phone number of home, mobile, office; the mailing address etc.) to be prepared and available with Ed Milukas. Each department head should also have the detailed contact information on all employees under his jurisdiction for quick communication in case of emergency.

As the pandemic level escalates, testing should be done to assure proper communication.

All department heads and project managers should be responsible for cascading the information to subcontractors, partnerships and companies in which the RDC employees has a participating interest.

7.0 Vaccination and Antiviral Medications

Once a pandemic begins, it will take months to prepare an effective vaccine and the vaccine may be in short supply. Employees will be notified if vaccines become available and should consult with their personal physician.

8.0 Travel Policy

If a pandemic develops, it is expected that many cities and areas institute sudden and harsh travel restrictions which RDC will have to comply with. Such restrictions shall be monitored by PPC and communicated to employees.

In addition, the following travel policy will apply to the different WHO levels:

Level	Policy
3	<ul style="list-style-type: none">● Travel not restricted
4	<ul style="list-style-type: none">● Travel to affected areas will require authorization from the Business Unit Manager and will be limited to business-essential travel.● Inbound or returning employees from affected areas will be asked to monitor their own health, and in case of flu symptoms seek medical care, advise their manager, and not return to work until they have been medically cleared.
5	<ul style="list-style-type: none">● Travel to affected areas will not be authorized● Inbound company travel from affected areas will require pre-authorization from Rick Neill or his designee.● Returning employees from any affected area will be asked to self-screen for symptoms, work from home for up to 10 days, and then return to work only if free from symptoms.
6	<ul style="list-style-type: none">● All Administrative Employee travel is prohibited without exception. This includes all work-related meetings, trips, and seminars. All meetings are to be held via teleconference. If necessary, Please contact IT to request additional conference bridge capabilities.

Ed Milukas will be monitoring ISOS Traveler Locator Service (<https://urgent.internationalisos.com>) and will provide key information about the status of pandemic/current Coronavirus and the affected areas/cities to PPC and Dept. head.

9.0 Expatriate Policy

In case of a potential expatriate evacuation, it is anticipated that the following policy will apply:

Level	Policy
4	<ul style="list-style-type: none">● If at all possible, expatriates and dependents will be evacuated from areas/cities/provinces where human to human transmission is occurring. They may be moved to another city where there is no

	<p>documented human to human transmission or they may be moved to another area. Decisions regarding essential personnel will be made on a case by case basis.</p> <ul style="list-style-type: none"> ● Dependents in provinces where human to human transmission has occurred will be offered the opportunity to leave, even if transmission has not occurred in the city where they are residing. ● If evacuation is carried out a screening process will be required prior to starting work in alternative RDC offices.
5	<ul style="list-style-type: none"> ● A screening process will be required prior to returning to work in RDC offices.
6	<ul style="list-style-type: none"> ● All Administrative Employee travel is prohibited without exception. This includes all work-related meetings, trips, and seminars. All meetings are to be held via teleconference. If necessary, Please contact IT to request additional conference bridge capabilities.

Exceptions to the above policy will be considered for place where medical infrastructure capable of managing the situation.

10.0 Employee Screening

The screening process will reduce the risk of bringing the infection into the workplace, exposing healthy workers, and reduce the spread of the disease. Employees should use the self-assessment questionnaire to assess their situation. If symptoms are present at the start of the shift or at any time during the day, the employee will be immediately isolated and asked to leave the facility. All appropriate site, client and company personnel will be notified immediately.

As of October 2, 2020, screening procedures shall include:

1. Self-assessment questionnaire – Reference Appendix A found on page 19 of this document.
2. Temperature kiosks have been installed in all of our office locations. These kiosks will assist in reducing the risk of building access by infected persons so that we can maintain a safe work environment for RDC employees. Once installed, employees and pre-approved visitors will be required to have their temperature checked upon entering the facility for the first time each day. A touchless hand sanitizer dispenser and entry requirements posting will be accompanying each temperature kiosk.

11.0 Continuity Measures

Business continuity measures with the integration of Operations, EH&S and HR should be properly considered and planned as well as being put in place in an effective and timely manner when pandemic breaks out (see action list.) Areas of assembly where more frequent use is expected, such as bathrooms, lunchrooms, etc. shall be considered for additional cleaning.

Avoid close contact

- Avoid close contact with people who are sick
- Put distance between yourself and other people.

- Limit gatherings of employees to as few as possible with a maximum gathering of ten (10).
- During start of shift, lunch and other times when larger groups are possible, manage group sizes by:
 - Implementing “Rolling Start Times” for shifts and lunch.
 - When eating lunch, eat outside, in vehicles or other areas where employees can put distance between themselves and others.

Clean your hands often

- Wash your hands often with soap and water for at least 20 seconds especially after you have been in a public place, or after blowing your nose, coughing, or sneezing.
- If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol. Cover all surfaces of your hands and rub them together until they feel dry.
- Avoid touching your eyes, nose, and mouth with unwashed hands.

Employee Assistance Program

How do I access EAP Services?

There are several convenient ways to access services:

By phone: call **1-800-252-4555** during standard business hours.

Emergencies or crises: If you need immediate assistance, our toll-free hotline is available 24 hours a day, seven days a week. Dial **1-800-252-4555**. (both voice and TTD services.)

By e-mail: If it is not an emergency, you can contact us by e-mail and get a response the next business day. [Click here to email](#).

Online: Access a variety of resources and tools by logging on to our password-protected

12.0 Action List

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Pandemic Phases	Situation	Actions	Due date	Status
Phase 1	No new Coronavirus subtypes have been detected in humans. A Coronavirus subtype that has caused human infection may be present in animals. If present in animals, the risk of human infections or disease is considered to be low.	1) Monitor the information on any deaths in the wild or domestic avian population	Ongoing	Ongoing
		2) Monitor the local press and health authority news	Ongoing	Ongoing
		3) Monitor any local regulations regarding travel restrictions, quarantine or control of antiviral medications or other relevant government policies	Ongoing	Ongoing
Phase 2	No new Coronavirus subtypes have been detected in humans. However, a circulating Coronavirus subtype poses a substantial risk of human disease.	1) Employees should be encouraged to take seasonal influenza vaccine shots – Shots provided to RDC employees in Fall 2020		Complete
		2) Provide current information to employees regarding Coronavirus.		Complete
		3) Education to raise employees' awareness of how the Coronavirus is spread		Complete
		4) Display posters in prominent areas to remind people of correct hygiene measures		Complete
Phase 3	Human infection(s) with a new subtype. No human-to-human spread or at most rare instances of spread to a close contact.	1) Set up a BU Pandemic Preparedness Committee (all major function heads should be the members)		Complete
		2) Develop a list of employees thought to be "mission critical" to keep the business running		Complete

Phase 3 (cont'd)	Human infection(s) with a new subtype. No human-to-human spread or at most rare instances of spread to a close contact.	3) Stockpile enough N-95 facemasks/respirators – Limited availability, will stockpile on an as needed basis	TBD	TBD
		4) Report any cases of Coronavirus illness in employees – Ed Milukas is the point of contact for communicating Coronavirus illness	Ongoing	Ongoing
		5) Develop plan for physically isolated work groups and cohorting that can be activated as/if needed during level 4 and above – Work from home policy will be enacted if necessary		Complete
		6) Develop the contact list with detail information including name, office number, home number and mobile of all RDC employees.		Complete
Phase 4	Small cluster(s) with limited human-to-human transmission. Spread is highly localized, suggesting that the virus is not well adapted to humans.	1) Limit travel to countries/cities classified by WHO as Pandemic Level 4 to business essential only – All travel to be authorized by Business Unit Vice President and Compliance Director, Ed Milukas	3/2/20	Ongoing
		2) Inbound/returning employees from countries/cities classified by WHO as Pandemic Level 4 will be asked to monitor temperature, and in case of Coronavirus symptoms seek medical care, advise their manager and not return to work until they have been medically cleared – 14 days minimum	3/2/20	Ongoing

Phase 4 (cont'd)	Small cluster(s) with limited human-to-human transmission. Spread is highly localized, suggesting that the virus is not well adapted to humans.	3) Expatriates in non-essential functions and dependents are encouraged to evacuate from cities classified by WHO as Pandemic Level 4, maybe to another city within the country with no documented human to human transmission. The exception to this policy will be considered if medical infrastructure capable of managing the situation	N/A	N/A
		4) Persons suspected to have Coronavirus illness should be isolated to minimize the risk of transmitting the virus to others. Communicated systems and requirement to stay home with Coronavirus-like illnesses		Complete
		5) Managers must monitor employees	Ongoing	Ongoing
Phase 5	Larger cluster(s) but human-to-human spread still localized, suggesting that the virus is becoming increasingly better adapted to humans, but may not yet be fully transmissible (substantial pandemic risk).	1) Closely monitor the spread of the pandemic wave from continent-to-continent or country-to-country – Committee members to monitor	Ongoing	Ongoing
		2) Issue facemasks / hand cleansers to all employees –	TBD	TBD
		3) Sanitize the office twice weekly – RDC has cleaning services at local offices	Ongoing	Ongoing
		4) Limit meetings and appointments to business essential only – Communication will need to be made to reduce large group gatherings	3/2/20	Update: all meetings via teleconference
		5) No unauthorized visitors admitted – Will communicate when necessary	3/13/20	Ongoing

Phase 5 (cont'd)	Larger cluster(s) but human-to-human spread still localized, suggesting that the virus is becoming increasingly better adapted to humans, but may not yet be fully transmissible (substantial pandemic risk).	6) Travel to countries/cities classified by WHO as Pandemic Level 5 will not be authorized – RDC has no current exposure but will not allow travel to these areas	3/2/20	Ongoing
		7) Inbound employees from countries/cities classified by WHO as Pandemic Level 5 will require the authorization of the HR or HSE representative – RDC has no current exposure but will not allow travel to these areas but will monitor	3/2/20	Ongoing
		8) Returning employees from Level 5 countries/cities will be asked to work from home for up to 14 days - RDC has no current exposure but will monitor as the situation escalates	3/2/20	Ongoing
		9) Non-essential expatriates and dependents will be required to leave the country. Decisions regarding essential expatriates will be made on a case by case basis – RDC has no current exposure, but will monitor	Ongoing	Ongoing
		10) Contingency Plan A) Field Work Activities - Labor Force: - When crew sizes are reduced at any capacity, due to non-availability, the crew make up will consider pairing the team to assure competency. At greater than 30 % reduction of crew size, crews must be combined to competency. Work activity will be prioritized to assure critical activity is	3/13/20	3/13/20

Phase 5 (cont'd)	Larger cluster(s) but human-to-human spread still localized, suggesting that the virus is becoming increasingly better adapted to humans, but may not yet be fully transmissible (substantial pandemic risk).	considered.		
		<ul style="list-style-type: none"> - Supply chain is sourced from multiple suppliers. We will be in contact with supply chain leads to assure we have a two week supply of critical items. 		
		<p>B) HR - Have a database of all staff and personnel working on any company site and their contact details</p> <ul style="list-style-type: none"> - Have an updated database of expatriate staff and their emergency contact details - Identify suitable evacuation destinations for expatriates and travelers and ensure visas to those destinations are ready 	Ongoing	Ongoing
		<p>C) IT -</p> <ul style="list-style-type: none"> - Make sure all manager laptops are in use - Ensure all managers have remote computer access - Have a documented backup plan for all critical operational data <p>Communication was sent to all personnel to test remote access to VPN</p>		Complete

Current Level Phase 6	Pandemic: increased and sustained transmission in general population.	1.) All Administrative Employee travel is prohibited without exception. This includes all work-related meetings, trips, and seminars. All meetings are to be held via teleconference. If necessary, Please contact IT to request additional conference bridge capabilities.	3/13/20	Ongoing
		2.) All Riggs Distler Facilities are closed to all outside Visitors without exception. This includes all Customers, Vendors, Suppliers, Sales People, Auditors, etc.	3/13/20	Complete
		3.) All Riggs Distler Administrative Employees who feel sick should report their status to their Manager and should Work from Home. If you feel sick, do not report to work.	3/13/20	Ongoing
		4.) All Riggs Distler Field Employees who feel sick should report their status to their Supervisor and should stay home and not report to work. If you feel sick, do not report to work.	3/13/20	Ongoing
		5.) Handshakes are prohibited and all physical contact should be avoided. Please wash your hands frequently with warm, soapy water for at least 20 seconds. Utilize hand sanitizer when available.	3/13/20	Ongoing
		6.) All Riggs Distler field meetings to be held at crew size level – “all-hands” meetings are suspended.	3/13/20	Ongoing

<p>Current Level Phase 6 (cont'd)</p>	<p>Pandemic: increased and sustained transmission in general population. (Cont'd)</p>	<p>7.) All Riggs Distler Administrative Employees should bring their laptop home at COB on Friday, March 13th. Once home, please verify that you have access to the Riggs Distler servers. Please contact IT to remedy any issues.</p>	<p>3/13/20</p>	<p>Ongoing</p>
		<p>8.) All Riggs Distler Administrative Employees should prepare for the future potential of working from home. Effective immediately and remaining in effect until noted otherwise, all Riggs Distler Administrative Employees should bring their laptops home at the conclusion of every work shift. All Riggs Distler Administrative Employees should also prepare to bring home essential files, etc. at the conclusion of each work day.</p>	<p>3/13/20</p>	<p>Ongoing</p>
		<p>9.) All Riggs Distler Employees are required to complete Appendix A - "Self-Assessment Questionnaire" found on Page 19 of this document on a daily basis. If, on the basis of this self-assessment, it is not appropriate for you to enter the work environment, please contact your Manager. The JSA will be used daily for each crew to signify that each crew member review the self-assessment.</p>	<p>3/13/20</p>	<p>Ongoing</p>
		<p>10.) Any Riggs Distler Employee deemed unable to enter the work environment must obtain documented approval from their physician prior to returning to work.</p>	<p>3/13/20</p>	<p>Ongoing</p>

		11.) Beginning March 20,2020, all RDC Offices will be closed on Fridays to non-essential personnel. All impacted Administrative Employees should plan to work from home.	3/20/20	Ongoing
		12.) All "High Risk" Administrative Employees: 70+ years old or people with serious chronic medical conditions such as heart disease, diabetes, and lung disease are recommended to stay home.	3/18/20	Ongoing
		13.) Ed Milukas, Compliance Director, has the sole authority to decide the appropriate RDC response to any Employee that is deemed as not appropriate to enter the work environment via RDC's "Coronavirus (Covid-19) Employee Self-Assessment dated 10/2/20."	3/18/2020	Ongoing
		14.) All RDC employees within 6 feet of another person for any reason must wear face covering. Additionally, all employees must have immediate access to face coverings, either on them, or close enough to grab if someone enters their 6 foot space.	4/6/20	Ongoing
		15.) Where possible, leave doors open to minimize common touch points	4/6/20	Ongoing
		16.) Covid-19 audit added to IndustrySafe to evaluate the effectiveness of the requirements of this plan	4/17/20	Ongoing
		17.) Where required, "Certified Covid-19 training" will	4/29/20	Ongoing

		be provided for the most senior person, or their designee, assigned full-time to a project. The duty of this position will be to enforce social distancing, face-coverings, and other requirements outlined by this document, state or client requirements.		
		18.) All Safety Coordinators and Managers completed Certified Covid-19 Training.	5/8/20	Complete
		19.) Developed and implemented Infrared Thermometer training for anyone using these devices to pre-screen employees.	5/15/20	Complete
		20.) Infrared Scanner Kiosk ordered as a pilot for the Cherry Hill Office.	4/23/20	Complete
		21.) Infrared Scanner Kiosks ordered and installed in all RDC offices.	8/18/20	Complete
		22.) Developing Return to work plans for the field and office.	5/29/20	Complete
		23.) Bi-polar ionization systems ordered and being installed in owned RDC offices.	7/01/20	Complete

Appendix A: (Revised October 30, 2020)

RDC Coronavirus (COVID-19) Employee Self-Assessment

Persons who shall complete this self-assessment:

- **All Riggs Distler & Company, Inc. Employees and all approved Visitors to RDC projects or facilities shall complete this Assessment before coming to work each day or entering a facility.**

Do any of the following currently apply to you?

- You have a fever (greater than 100 Degrees Fahrenheit) and/or respiratory symptoms, diarrhea or other unexplained illness, or have been told by a health-care professional that you are presumptive positive or positive for Coronavirus. **If so, we are directing you to remain away from work until you receive a negative test and are released by your personal physician.**
- Someone in your household has tested positive or has been told by a health-care professional that they are presumptive positive for Coronavirus. If so, we are directing you to stay away from work for a minimum of 14 calendar days **(even with a negative test)** to ensure you have not contracted the Coronavirus.
- You or a family member knowingly came into close contact (within 6') with someone that has tested positive for Coronavirus. If so, we are directing you to stay away from work for a minimum of 14 calendar days **(even with a negative test)** to ensure you have not contracted the Coronavirus.
- **Travel:** Any RDC employee that travels for personal reasons to a recognized hot spot will be required to quarantine for 14 days upon return **(even with a negative test)**; Is required to complete the RDC COVID-19 Travel Questionnaire – *accessible by the link and / or QR Code below*; And to call the RDC Covid-19 Travel Point of Contact, Ed Milukas, before returning to work. He can be reached at 267-236-2879. While traveling, please keep up to date with your state's travel requirements by accessing them through the link or QR Code below.



[Link to: RDC COVID-19 Travel Questionnaire](#)



[Link to: List of COVID-19 Hot Spots](#)

If, on the basis of this self-assessment, it is not appropriate for you to enter the work environment, please contact your manager if you are an employee. Non-employees should communicate with their company.

NOTE: If you are at higher risk for serious illness from COVID-19 because of your age or because you have a serious long-term health problem, it is recommended by Riggs Distler that you stay at home to avoid exposure.