

PURPOSE

Cody Brock Commercial Builders (CBI) is taking every step possible to do our part to help contain the COVID-19 outbreak and minimize the risk of exposure for our people and subcontractor teams. To that end, we have adjusted our typical operations protocol at all CBI jobsites and offices to take the proper precautions in accordance with guidelines from the CDC and local County Health departments. As a follow-up to prior communications, we would like to provide clarity on what is acceptable related to interactions with CBI team members and subcontractor team members.

Our method of communication to all workers is through our Safety Portal.

SCOPE

This work plan applies to all CBI Projects and their field offices. This does not apply to public rights of way, sidewalks, or other adjoining areas where CBI has no authority. This plan is site-specific and should be used only for CBI jobsites.

Please show your support by demonstrating the following:

1. MAINTAIN SOCIAL DISTANCING
2. WASH HANDS OFTEN
3. COVER NOSE AND MOUTH WHEN COUGHING OR SNEEZING
4. WEAR CLOTH FACE COVERING
5. STAY HOME IF YOU ARE SICK
6. AVOID CONTACT WITH ANYONE WITH COLD OR FLU-LIKE SYMPTOMS
7. CLEAN FREQUENTLY TOUCHED SURFACES
8. REPORT ALL INCIDENTS IMMEDIATELY

COVID-19 CODE OF SAFE PRACTICES

1. If you feel sick and/or have been exposed to anyone who is sick, stay at home. You may be required to provide test results showing a negative result (not infected) before being allowed to return to work. This is critical to preventing spread of the virus.
2. Enter and exit the jobsite only at approved locations. Maintain a social distance of 6 feet at all times.
3. Daily screenings will be required before entering the jobsite. This includes an attendance entry with worker's name, address, phone, and email.
4. Workers who leave and return to the jobsite on the same day will be screened again before entering the jobsite.
5. Wash hands frequently for at least 20 seconds with soap and water. Avoid touching your face with unsanitized hands. Avoid touching common surfaces with bare hands.
6. Constantly observe your work distances in relation to other staff. Maintain the recommended 6 feet at all times unless wearing the necessary PPE for working in close proximity to another person.
7. Do not shake hands or make other direct contact with other staff.
8. Do not carpool with other staff unless they are family members living within your household.
9. Do not share phones. Use of microwaves, water coolers, and other similar group equipment for breaks are suspended until further notice.
10. Clean personal tools and group tools before and after use.
11. If your task requires working in close proximity to another person, review the required JHA to ensure you are equipped with the proper PPE and are trained in and understand the directions for use. Do not start any task until you have been properly equipped and trained on procedures.
12. All workers shall wear Cloth Face Coverings while on CBI jobsites. It shall be the responsibility of each individual Employer to meet this mandatory order.
13. Clean and maintain your personal PPE and do not loan any item to other staff.
14. Disposable PPE, paper towels, and similar waste must be deposited in non-touch waste bins.
15. Do not cough or sneeze into your hand; rather, direct coughs and sneezes into the crook of your arm at your elbow; follow established CDC guidelines.
16. Workers should change work clothes and shoes prior to arriving at home. Launder work clothes separately from other laundry.

Determining Risk for Construction Workers

Current information suggests that COVID is spread through close personal contact, such as touching or shaking hands, followed by the touching of mouth nose and eyes, or airborne respiratory droplets expelled during regular talking and breathing or coughing and sneezing. It can also be spread by touching a contaminated surface or object, then touching the mouth, nose, or eyes.

Because of these transmission methods, being in close proximity (within but not limited to 6') to an infected person can result in transmission. Enclosed spaces, confined spaces, and any space with recycled air presents additional risk exposure and should be avoided as much as possible.

General Precautions for Construction Workers

Avoid close contact with people who are sick. If you are sick or have had close contact with someone who has COVID-19, stay home and call your Health Care Provider.

Wash your hands frequently with soap and water for at least 20 seconds. Use hand sanitizer with at least 60% alcohol when soap and water are not available.

Always follow good hand-washing practices;

- Upon arriving at the jobsite and before going home at the end of the day.
- Before and after eating.
- After using the toilet.
- After touching garbage or other waste materials.

Always follow good hygiene practices:

- Cover your nose and mouth when coughing. Sneeze into a tissue if possible or your upper sleeve or elbow, not your hands. Dispose of the tissues in the trash after use and wash your hands.
- Avoid touching your mouth, nose, and eyes as much as possible.
- Practice Social Distancing by limiting person-to-person contact within 6' especially with large groups or in enclosed spaces.
- Don't shake hands or high-five others.

Cloth Face Covering

When working on CBI projects, all employees, vendors, Trade Partners, and visitors will be required to wear a Cloth Face Covering as ordered by the County Health Office dated 4/22/20. Each Subcontractor is required to meet this mandate for their employees. CBI will supply Cloth Face Coverings to staff only and will not be providing Cloth Face Coverings to Trade Partners, Vendors, or their employees.

Effective 4/22/20: Face coverings are now required to be worn by employees when at a jobsite. The masks must not have valves (one-way flow) to limit the spread of contaminants.

Cloth Face Coverings can be fashioned from household items or made at home from common materials at low cost per CDC examples.

Common recommendations include bandannas, scarves, shirts, or similar garments. CDC recommendations on making Cloth Face Coverings and caring for Cloth Face Coverings is attached and posted throughout the jobsite.

Cloth Face Coverings should not be N-95 medical grade masks or surgical masks. N-95 masks with one-way valves (plastic mouthpiece) are not acceptable as they allow droplets to escape. These types of masks should be reserved for the medical professionals. Single-use Cloth Face Coverings shall be properly disposed of into trash receptacles. Any reusable Cloth Face Coverings must frequently be washed to protect the safety of the wearer and others. They should be washed at least once a day.

Personal Protective Equipment – All Trades

PPE specifically for use in construction, including, gloves, goggles, face shields, and face coverings as appropriate for the activity being performed are provided for CBI employees. Trade partners are responsible for providing their employees the appropriate PPEs. Mandatory PPE during this COVID-19 pandemic will be strictly enforced. Workers who are not in compliance will be asked to leave the jobsite.

PPE training shall be provided by CBI to their employees frequently during this pandemic. The training must include the following:

- The proper use of PPE
- Not sharing PPE
- Disinfecting PPE
- Proper disposal of PPE

A log of the training must be maintained by the CBI management at each jobsite. Trade partners must meet this requirement for their employees.

Important Note: Personal Protective Equipment MUST NOT be shared between workers.

Guidelines for Field Operations and Job Site Cleaning

Jobsites shall maintain regular housekeeping practices including routine cleaning and disinfecting of surfaces, equipment, other elements of the work environment. A COVID Safety Compliance Officer (SCO) shall be dedicated to enforce these requirements. A set number of Staff members shall be dedicated to this housekeeping routine. The dedicated cleaning staff shall be provided with all the necessary tools, equipment, and supplies necessary to complete the task of daily cleaning.

Unused and unoccupied rooms, facilities, or spaces shall remain closed and inaccessible to maintain cleanliness. Cleaning shall be done on the following items in occupied portions of the structure and shall be cleaned daily.

- All Doorknobs/Handles
- Temporary Toilet Door Handles
- Temporary Sinks, Hand Soap Dispensers, and Paper Towel Dispensers
- Lunch Area tables and benches
- Elevator Cars, handles, and call buttons
- Man Lift doors and controls
- Man Lift Call Boxes
- Job Box handles and Tool Storage door handles
- Tools and Equipment
- Light Switches
- Stair Handrails

A checklist of areas to be closed and areas to be cleaned should be created and utilized to ensure regular cleaning of high-traffic areas. Identified COVID SCO shall inspect cleaning activities and make improvements and adjustments as necessary.

Personal Hygiene

- 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.
- Stay at home if you are feeling ill or are displaying any of the symptoms noted in *Daily Checklist*.
- Do not shake hands.
- Clean work space continually throughout the day with disinfectant.
- Cover your mouth with bent elbow or tissue when coughing or sneezing, then wash your hands immediately with soap and water.
- Do NOT share PPE.
- Do NOT share phones or other devices.
- Do NOT share tools unless they have been disinfected.
- Do NOT carpool unless workers are from the same household. Must show proof.

Training for Cleaning Crews

Follow the manufacturer's instructions for use of all cleaning and disinfecting products (e.g. concentration, application method, and contact

time, PPE.). Cleaning crews should participate in a standard Job Hazard Analysis for their work.

Cleaning crews should discuss the following as part of the JHA process Safety Data Sheet for the products they are using:

- Understand how to safely mix and apply the products they are using
- How to properly put on and take off PPE
- How to dispose of used PPE

Disinfecting Schedule: At a minimum, the work areas with high traffic will be disinfected twice a day, once before the shift begins and once before the shift ends.

Personal Protective Equipment While Cleaning

Cleaning Crew shall wear all appropriate PPE as determined by the Safety Data Sheet provided for the product being used.

At a minimum, cleaning crew shall use:

- Disposable gloves
- Safety glasses with side shields or Goggles to prevent splashes into the eyes
- Long sleeves are recommended to prevent prolonged exposure to cleaning agents on the skin while cleaning
- N-95 Respirator may be appropriate for cleaning crews if the product used requires respiratory protection.

Daily Screening Protocols

A daily screening protocol shall be implemented to ensure that infected people do not enter the site. If workers leave the site, they shall be rescreened prior to re-entry. All CBI job sites shall establish an assembly point for staff before the start of each shift that complies with Social Distancing of 6’.

- It will be the responsibility of Each Trade Partner to prepare and adhere to the requirement of Daily Screening Protocols.
- CBI’s screening protocol shall consist of a self-assessment as provided in the Safety Portal.
- Daily “Safety Tailgate” meetings shall be held regarding information on the current COVID-19 Pandemic. Digital records of these meetings shall be stored for review. It is the responsibility of each employer to adhere to this requirement.
- CBI shall not use shared pens, papers, clipboards, or tablet-like devices to record or provide this information. Where a signature is required, a digital photograph shall suffice. Alternatively, a single source checklist on the safety portal shall be used to record confirmation of screening and attendance to “Safety Tailgates.”
- Records of attendance shall be provided via digital documents. CBI will accept digital photographs of those present for the daily “Safety Tailgate” as proof of the meeting being held and of individual attendance.

Daily Briefings

CBI will conduct daily briefings either in person or digitally to all workers on the jobsite. The briefings will cover the following:

- New jobsite rules and pre-job site travel restrictions for the prevention of COVID-19 virus at the jobsites
- Review of sanitation and hygiene procedures
- Solicitation of worker feedback on improving safety and sanitation
- Coordination of construction site daily cleaning/sanitation requirements
- Conveying updated information regarding COVID-19
- Emergency protocols in event of an exposure or suspected exposure to COVID-19

Social Distancing Measures

In order to comply with recommendations regarding Social Distancing, CBI will implement the following Social Distancing practices in areas where the scope of this document applies. Failure to follow Social Distancing requirements in areas where this plan applies will be subject to the standard Disciplinary Policy as found in the CBI Safety Reference Manual.

It must be understood that although Social Distancing is in effect, CAL/OSHA requirements still apply and have not been lifted during this emergency. Where following Title 8 California Code of Regulations prohibits, limits, or makes less effective our Social Distancing procedures, we must and will comply with T8 CCR over other considerations.

Social Distancing General

- Morning huddles, toolbox talks, foreman's meetings, and other gatherings shall be held outside in the open air.
- All meetings shall be held with the Social Distancing of 6' strictly adhered to.
- Typical greetings such as handshakes, fist bumps, and high-fives shall be prohibited.
- Group notes, sign in sheets, shared pens, shared clipboards, and shared tablet devices shall be prohibited.
- Where notation of individual presence is required for record keeping, a digital photograph shall suffice.
- Job site walks with various on-site team members is still acceptable with the use of Social Distancing of 6.'
- Staggered trade-Specific work will be implemented to limit the quantity of workers at the jobsite at one time.
- Staggered stop and start times for shift schedules will minimize "choke points" during arrival, breaks, and departure.
- Control "Choke Points" where workers can't maintain 6' social distancing.
- Minimize interactions and maintain social distancing with delivery workers, design professionals, and other project consultants including building inspectors.

Social Distancing Job Site Protocol

- Signage at each entrance to the job site to inform all employees and vendors that they should avoid entering the facility if they have a cough or fever.
- Where feasible, doorways shall be left open to reduce common touchpoints and to promote fresh flow of air.

- When traveling on stairs and stairwells, employees shall take into consideration Social Distancing. As employees travel from one floor to the next, individuals shall give right of way to those traveling upwards.
- Where possible when employees meet in stairwells, the individual traveling downwards shall exit the stairs onto a floor to allow for free passage of those traveling upwards.
- When traveling through hallways, employees will exit into an adjacent unit to allow for Social Distancing.
- Right of way shall be given to those carrying or hauling materials.
- At bottleneck areas such as in front of the Man Lift, job site entrances, and at other gathering points, Social Distancing of 6' will be strictly enforced.
- The Man Lift interior shall have appropriate markings placed on the floor to indicate where individual employees should stand to maintain Social Distancing of 6'.
- Outside the Man Lift gates, appropriate markings should be placed on each floor to indicate where individual employees should wait for the Man Lift to maintain Social Distancing of 6'.
- The Man Lift operator will be given instruction to not allow more than the safe number of employees into the Man Lift in line with the Social Distancing of 6'.
- The Operator will have the authority to remove individuals from the Man Lift and to regulate and enforce Social Distancing of 6' in front of all Man Lift gates.

Social Distancing Office Protocol

- CBI offices will not be accepting outside visitors at this time. Phone/video conferencing and collaboration such as WebEx can successfully take the place of in-person communication needs.
- CBI Project staff will wipe down high-traffic areas and surfaces daily at their personal workstations and common areas inside the project field office.
- Desks and workstations will be separated by the Social Distancing requirement of 6’.
- Where meetings are required between CBI Project Staff, the same considerations for meetings with visitors and trade partners will be applied.
- All meetings shall be held with the Social Distancing of 6’ strictly adhered to.
- Typical greetings such as handshakes, fist bumps, and high-fives shall be prohibited.
- Group notes, sign in sheets, shared pens, shared clipboards, and shared tablet devices shall be prohibited.
- Where notation of individual presence is required for record keeping, a digital photograph shall suffice.
- Jobsite walks with various on-site team members is still acceptable with the use of Social Distancing of 6.’

Authority and Responsibility

Superintendent - responsible for implementing the Covid-19 Safety Plan onsite

- Shall be responsible for managing and communicating requirements for Social Distancing, appropriate hygiene, and monitoring of the workforce for signs and symptoms of illness.

- Shall communicate accurate Public Safety Messages and enforce, where feasible, all requirements as published by Local, State, and Federal Agencies.
- Provide appropriate and immediate investigations and provide information in a timely manner to Public and Private Entities as required.

COVID Safety Compliance Officer (SCO)

This person or persons will be the individuals monitoring and enforcing the plan. This should be their main responsibility onsite. Additional responsibilities include:

- Inspect cleanliness of highly occupied spaces
- Establish the Daily Screening protocol
- Organize and manage cleaning crews onsite daily
- Identify non-compliance and prepare a remediation plan
- Ensure daily briefings are effective and available to all workers
- Manage social distancing and education of COVID-19 guidelines including Safety Tailgates, Public Health Announcements, and response to unsafe or unsanitary conditions on site

InFocus Safety Solutions, Inc. is a resource to site personnel to oversee development and implementation of this plan.

Additionally responsible to:

- Assess, update, and audit our COVID-19 response plans as conditions change
- Manage investigation into unsafe or unsanitary conditions as reported throughout each region

Trade Partners/Subcontractors shall carry out their work in a manner that places worker safety and health as the highest priority and is consistent with the requirements of this document. They must provide their own COVID-19 Response Plan and are responsible for disinfecting their own tools and equipment.

Response to a Positive COVID-19 Test

If the sick individual tests positive for COVID-19, that employee will remain in quarantine, away from the jobsite, for at least 14 days or until tests are negative, following CDC guidelines for quarantine. Medical attention should be sought if conditions worsen and as necessary. <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html>

If the infected employee had been in close, direct contact with any of the other members of the subcontractor's crew, those members of the crew shall stop work and will be asked to self-isolate for 14 days. Those employees shall remain in quarantine for 14 days or until negative test results are provided. Those who test positive shall remain in quarantine and follow CDC quarantine guidelines to preserve their health and the health of others. Medical attention should be sought if conditions worsen, and as necessary. Those who test negative, will be allowed to return to work at the construction site. <https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>

A quarantine location at the jobsite will be identified in the daily briefings for any employees who become sick or begin showing symptoms while at the jobsite. The determination will then be made how to safely transport the individual to the appropriate medical facility.

In event of a positive test at the jobsite, the jobsite will be shut down and disinfected thoroughly. The County Public Health Department will be notified and a remediation plan will be submitted.

OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for recordability and reportability under OSHA's recordkeeping rule. OSHA requires construction employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employee. "In-patient" hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has made a determination that COVID-19 should *not* be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an "illness." However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 (but not a confirmed diagnosis), the recordability analysis would not necessarily be triggered at that time.

If an employee has a confirmed case of COVID-19, the Company will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the

illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from an exposure outside of the work environment, it would not be work-related, and thus not recordable.

The Company's assessment will consider the work environment itself, the type of work performed, risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the Company will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

Document Updates and COVID Policy Changes

The current situation is changing every day. As new information, guidance or directives from any Local, State or Federal Agency is provided we will update and include these changes in this document.

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