

COVID-19 PREPAREDNESS AND RESPONSE PLAN

I. Purpose

This COVID-19 Preparedness and Response Plan (“Plan”) is adopted in compliance with Michigan Governor Gretchen Whitmer’s Executive Order. This plan covers Agri-Valley Communications, Inc. (“AVCI”) and its affiliated companies Pigeon Telephone, Thumb Cellular and Agri-Valley Services.

II. Essential Workers

AVCI, and its affiliated companies, is classified as an Essential Critical Infrastructure Company. Employees of the company are considered Critical Infrastructure Workers and have been designated as such.

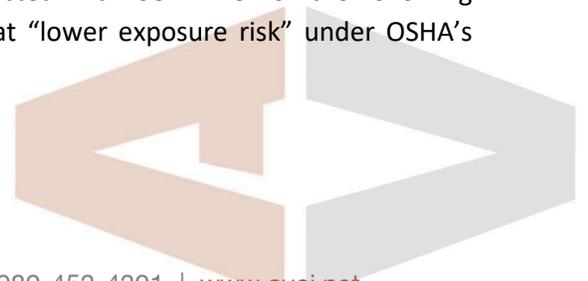
III. Workplace Considerations

There is anticipated exposure from close contact with the general public and people who may not know or suspect that they are infected with COVID-19. AVCI considers the following positions to be at “medium exposure risk” under OSHA’s Guidance on Preparing Workplaces for COVID-19 (OSHA Guidance):

1. Courier/Float Customer Care Representative
2. Customer Care Representative
3. Customer Service Representative
4. Field Technician
5. Field Technician/Installer
6. Key Account Manager
7. NOC Switch Technician
8. OSP Fiber/Service Drop Technician
9. OSP Technician
10. Sales Executive
11. System Performance/RF
12. Tech Team Office Clerk
13. Tech Team Technician

At this time, AVCI does not anticipate exposure from close contact with the general public and people who may not know or suspect that they are infected with COVID-19 for the following positions. The Company considers these positions to be at “lower exposure risk” under OSHA’s Guidance on Preparing Workplaces:

1. Accounts Receivable Clerk
2. Advanced Equipment Technician
3. Assignment & Field Tech Assistant



4. Assistant Network Manager
5. AVS Assistant Manager
6. Billing Specialist
7. Business Development Manager
8. Chief Financial Officer
9. Collections Specialist
10. Corporate Accountant
11. Data Systems Technician
12. Dispatch & Assignment
13. Executive Assistant
14. Human Resources Manger
15. Human Resources Specialist
16. Inventory/Purchasing
17. Key Account Assistant
18. Maintenance Worker
19. Manager AVS/Pigeon Telephone
20. Manager Network Operations
21. Manager Thumb Cellular
22. Manager truNet
23. Marketing/Web/PR/Social Media
24. Network Technician
25. OSP Locate Technician
26. Payroll Clerk
27. Plant Clerk
28. President/CEO
29. Product Development Specialist
30. Repair Technician
31. Roaming Coordinator/Acct. & Fin. Analyst
32. Senior Accountant
33. Treasurer
34. Vice President/COO
35. VoIP Technician
36. Wireless Service Coordinator

IV. Basic Infection Prevention Measures & Safe Work Practices

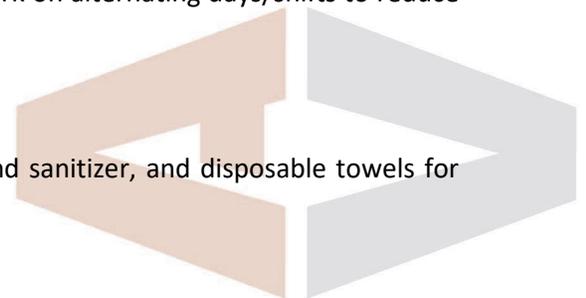
To protect its in-person workers, AVCI will:

1. Designate a worksite COVID-19 supervisor for each office. The COVID-19 supervisor is responsible for the implementation, monitoring and reporting of the COVID-19 strategies outlined in this document. It is the responsibility of the worksite COVID-19 supervisor to remain on-site at all times when employees are present or to designate an on-site employee to perform this COVID-19 supervisory role in their absence.

2. Require in-person workers to comply with the social distancing practices described in EO 2020-42, which includes keeping workers at least six feet from one another to the maximum extent possible and restricting the number of workers present in the workplace to no more than is strictly necessary to perform the business's or operation's critical infrastructure functions or its minimum basic operations.

If employees are unable to consistently maintain six feet of separation, they are required to wear a face covering.

3. Encourage workers to remain at their workstations as much as possible to limit exposure to other employees.
4. Promote frequent and thorough hand washing, by providing workers with a place to wash their hands. If soap and running water are not immediately available, the employer will provide alcohol-based hand rub containing at least 60% alcohol.
5. Require workers to stay home if they are sick.
6. Encourage respiratory etiquette, including covering coughs and sneezes.
7. Discourage workers from using other workers' phones, desks, offices, or other work tools and equipment, when possible.
8. Maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment. When choosing cleaning chemicals, AVCI will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. AVCI will follow the manufacturer's instructions for use of all cleaning and disinfection products (e.g., concentration, application method and contact time, PPE).
9. Train employees on workplace infection control practices, use of PPE, steps to notify ACVI of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19, and how to report unsafe working conditions.
10. Direct that face-to-face meetings should be replaced with virtual meetings, and to the extent possible/feasible prohibit gatherings of 10 or more people.
11. To the extent feasible, allow in-person workers to work on alternating days/shifts to reduce total number of employees in the facility.
12. Discontinue nonessential travel for workers.
13. Provide tissues, no-touch trash cans, hand soap, hand sanitizer, and disposable towels for workers and the public.



14. Employees are to limit sharing of equipment and tools to the extent possible and if that cannot be done, they are to clean and/or sanitize equipment.

V. Identification and Isolation of Ill Workers and Customers; Response

1. AVCI will instruct in-person workers to self-monitor themselves for signs and symptoms of COVID-19. Workers must not report to work if they have signs or symptoms of COVID-19 or other illness.
2. AVCI will implement policies to prevent workers from entering the premises if they display respiratory symptoms or have had contact with a person with a confirmed diagnosis of COVID-19. All employees, contractors, and customers entering AVCI offices will be required to complete a self-declaration questionnaire. AVCI may also require workers to take their temperature and record the result in writing before working.
3. AVCI will implement policies to keep public patrons informed about symptoms of COVID-19 and ask sick individuals to minimize contacts with workers. Where appropriate, the company may limit the public's access to the worksite or restrict access to certain areas.
4. Notwithstanding anything in the company's employment policies, no written note from a physician is required for workers who are staying home from work due to illness, however, AVCI will require employees to provide documentation and information permitted and required by the Department of Labor in connection with covered leaves under the Families First Coronavirus Relief Act. .
5. Workers in the workplace who display signs or symptoms of COVID-19 must be immediately isolated from other workers. The worker with signs or symptoms of COVID-19 should be placed in a separate room with closable doors until he or she leaves or is transported from the workplace. The worker should wear a face mask or removable face shield to protect against droplet transmission until he or she leaves or is transported from the workplace.
6. All workers may take any leave permitted under federal or state law or the AVCI's policies, including any leave for which they are eligible and for which they have a qualifying reason under the Families First Coronavirus Response Act, unless the employer has excluded them from leave under the FFCRA.
7. If an in-person worker tests positive for COVID-19, AVCI will take additional measures that are reasonable under the circumstances, which may include closing the affected building (or part of the building) to all workers; notifying all workers who interacted with the infected person of the potential exposure; and having the affected building (or part of the building) professionally cleaned and sanitized.
8. AVCI will install physical barriers, such as clear plastic sneeze guards, where feasible and appropriate, and may implement other strategies where possible to minimize face-to-face contact (e.g., phone-based communication, and telework). Physical signs or markings will be placed where necessary to avoid contact in office areas to limit congestion and all employees are to keep 6 feet from each other to the extent possible when entering an ACVI

building at the beginning of their work day. Use face coverings in any meeting, turn off water fountains, and wear face coverings when in any shared spaces or moving through ACVI offices or around others, including in hallways and restrooms. In any office setting, work areas are to be cleaned at least twice a day and doors and other items and areas that are shared or touched are to be cleaned regularly.

9. AVCI will inform workers of the availability of medical screening and other worker health resources such as an on-site nurse or telemedicine services.

VI. Personal Protective Equipment (“PPE”)

Based on the nature of the workplace and the worker’s task, the worker may need to wear a combination of gloves, a face covering, and/or a face shield or goggles. Pursuant to the OSHA Guidance for medium exposure risk workers, “the employer should select the combination of PPE that protects workers specific to their workplace.” ACVI will offer employees non-medical grade face coverings to all employees and review all applicable federal and state requirements and guidance regarding the use of PPE.

Workers with questions or concerns should contact their supervisor.

VII. Reporting Unsafe Working Conditions

Employees should report unsafe working conditions to his/her team lead. Employees may also complete the AVCI “Safety Concern/Suggestion & Near Miss” form available on the intranet.

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