

SSH COVID – 19 Outbreak Response Plan

03-27-20

COVID -19 is a virus that has the potential to cause severe illness and pneumonia in some people. The offices and facilities of SteelSummit Holdings and its group companies Magic Steel and Summit Global Trading (collectively known as **(SSH)**) are at risk due to the potential for close contact from, suppliers, visitors, shared spaces (including restrooms, copiers, breakrooms) and visitors.

- 1) This outbreak response plan will go into effect when and if the CDC issues a health alert and/or an employee has been exposed to or test positive for COVID-19, and will follow Executive Orders both on a Federal, State, and Local level.
- 2) SSH Senior Leadership Group will be responsible for the implementation and coordination of this plan.
- 3) The following policies will go into effect immediately:

A. Visitor Policy

- Limited access to our facilities for business-critical activities only.
- An exemption will be made for inbound and outbound freight delivery, equipment maintenance, mail, and office supplies
- All authorized visitors will be required to acknowledge questions on our COVID-19 Questionnaire.
- Non-essential visitor requests must be approved in advance by Executive Management.

B. Business Travel

- Implement a travel ban on all international business air travel outside of the United States
- Implement a travel ban on all domestic business travel by air, rail, or public transportation.
- Automobile travel for visits to customers, vendors, and travel between SSH offices and facilities is permitted for business-critical travel that cannot be done remotely.

C. Remote Work Policy

- Coronavirus Quarantine: If a medical professional, or a governmental authority, instructs an employee to participate in a quarantine due to the employee's exposure, or potential exposure, to the coronavirus disease known as COVID-19, the employee may work remotely for so long as the employee's

Manager continues to conclude that the employee is capable of doing so effectively.

- Office Access Restriction: If an employee is unable to access a SSH office because the employee traveled (within a previous 14 day period) to any country subject to a Level 2 Travel Alert or a Level 3 Travel Warning issued by the Center for Disease Control, the employee may work remotely until such 14 day period expires, provided, however, that the employee may work remotely only for so long as the employee's Manager continues to conclude that such remote work is necessary and the employee is capable of performing such work effectively.
 - Minor Sickness: SSH encourages all employees to take personal time off, and utilize available short-term disability benefits, to prioritize the improvement of their health. SSH does not require an employee to work remotely if the employee is sick. However, an employee may seek permission from the employee's Manager if the employee reasonably believes the illness, and any associated symptoms, are minor and do not inhibit the employee's ability to work, or to recovering from such illness. Under such circumstances, the employee may only work remotely for so long as the employee's Manager continues to conclude that such remote work is necessary, and the employee is capable of performing such work effectively.
 - Other: If other circumstances arise that give an employee concerns about potential exposure to coronavirus (such as school closures) and may necessitate the employee's need to work from home (or need for a revision to this policy), the employee should contact their HUMAN RESOURCE MANAGER.
 - The Management Team and Administrative employees will be divided into teams that will be assigned alternating days or as directed to work from home to minimize exposure.
 - Employees that work in positions that do not need physical interaction with the office will be directed to work exclusively from home.
- D. **FMLA** – as outlined in the SteelSummit and Magic Steel Employee Manual Policy Guide.

- 4) SSH offices and facilities will make every effort to maintain adequate supply of inventory and service for our customers.
- 5) SSH will implement social distancing practices to minimize exposure between employees, suppliers, authorized visitors, and shared spaces.:
 - Maintain a distance of 6 feet from others when possible
 - Remain out of congregated settings of 10 or more people
 - Refrain from hugs and handshakes
 - Wash hands frequently following the CDC guidelines
- 6) SSH will utilize multiple communication methods to provide COVID-19 updates to our employees, suppliers, customers, and business partners. Here are just a few examples:
 - Routine employee e-mail communication
 - Postings on the plant bulletin boards/Marlin Boards
 - Team Meetings
 - Special notices on our SteelSummit/Magic Steel websites
 - Skype-conference calls
 - Telephone conference calls
 - Broadcast messages thru Paycom (HR Payroll software)
 - Employee Attendance call in lines
- 7) SSH will adjust the workforce to match customers' demands and limit the potential exposure to COVID-19
- 8) To protect our employees while they are at work, SSH will do the following:
 - A. At the start of each shift, production operators and office personnel will use disinfectant spray and/or disinfectant wipes to wipe down the following:
 - Equipment controls (slitters and packing lines)
 - Crane Remotes
 - Coil car Remotes

- Tablets
 - Keyboards
 - Mouse
 - Forklift Controls
 - Barcode Scanners
 - Copier control panels (before and after use)
 - And any other devices used by more than one employee in the plant and offices.
- B. Limit the size of gatherings to 10 or fewer employees while keeping a 6-foot space from each other. This would apply to:
- Meetings
 - Training classes
 - Employee Breaks and Lunches
- C. When the employee gatherings have finished, employees will be required to wipe down the area they occupied with a disinfectant.

9) Response

- A. Should one of our employees come in contact with a person who has tested positive for the COVID-19 virus but is showing no symptoms, we will take the following actions:
- SSH requires the employee to notify their Human Resource Manager immediately
 - *SteelSummit Ohio & SteelSummit TN. Michelle Petersen 615.779.0609*
 - *Magic Grand Rapids & Magic Decatur: Brenda Ritsema 616.532.1347*
 - If notification by the employee is made through their supervisor, it is the responsibility of the supervisor to notify the Human Resource Manager.

- The company will insure the employee that he/she will not be identified by name to their co-workers as having come in contact with a person testing positive for the virus, in compliance with the Americans With Disabilities Act (“ADA”) and HIPPA.
 - Instruct the employee to stay home for at least 14 days and encourage them to self-quarantine during that time. Should the employee develop symptoms they will be required to contact a qualified health care provider to provide return to work documentation.
 - Arrangements will be made for the employee whose job function allows them to work remotely from home. For those non-exempt hourly employees that cannot work remotely, the employee will receive compensation according to SSH and Federal Guidelines.
 - Providing the employee shows no symptoms they will be allowed to return to work following the 14-day self-quarantine period.
 - Should the employee test positive for the COVID 19 virus, then SSH will follow the guidelines in section 9B of the COVID 19 Outbreak Response Plan.
- B. Should one of our employees test positive for the COVID-19 virus we will take the following actions:
- SSH requires any employee who has tested positive for the COVID 19 virus to notify their Human Resource Manager immediately.
 - *SteelSummit Ohio & SteelSummit TN. Michelle Petersen 615.779.0609*
 - *Magic Grand Rapids & Magic Decatur: Brenda Ritsema 616.532.1347*

- If notification by the employee is made through their supervisor, it is the responsibility of the supervisor to notify the Human Resource Manager.
- Insure the infected employee that he/she will not be identified by name to their co-workers as having contracted the virus, as such would run afoul of the Americans With Disabilities Act (“ADA”) and HIPPA.
- Instruct the infected employee to stay home for at least 14 days and encourage them to self-quarantine during that time. SSH will also require the employees to contact a qualified health care provider to provide return to work documentation.
- The infected employee will be asked (to the best of their recollection) to identify all office and manufacturing areas where they were physically present during the 14 days prior to the positive test results. SSH will have those areas sanitized immediately by a professional and in accordance with CDC guidelines.

CDC Guidelines

- a. It is recommended to close off areas used by the ill persons and wait as long as practical before beginning cleaning and disinfection to minimize potential for exposure to respiratory droplets.
 - b. Open outside doors and windows to increase air circulation in the area. If possible, wait up to 24 hours before beginning cleaning and disinfection.
 - c. Outside Cleaning Provider should clean and disinfect all areas (e.g., offices, bathrooms, and common areas) used by the ill persons, focusing especially on frequently touched surfaces.
- Those employees identified as coming in contact with the infected employee, will be advised that an individual that has been physically present in their work area has tested positive for the virus. Therefore, out of an abundance of caution, SSH requests they stay at home for the next 14 days at a minimum and encourage them to self-quarantine.

- Arrangements will be made for the employee whose job function allows them to work remotely from home. For those non-exempt hourly employees that cannot work remotely, the employee will receive compensation according to SSH and Federal Guidelines.
 - We also encourage the impacted employees to reach out to a qualified health care provider to seek advice as to what additional steps, if any, should be taken at that time—including whether the 14-day quarantine period is enough.
- 10) The SSH Human Resource Department as well as the Corporate EHS Manager will monitor the situation through the CDC, Federal, State, and local Government Officials and communicate development to the Senior Leadership group.
- 11) Following this COVID 19 crises, the EHS Leadership Team will identify learning opportunities and take action to implement any corrective actions to the plan. This will enable SSH to prioritize and customize strategies for future pandemic events.