Pandemic Response and Action Plan
(COVID-19)

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Revision History

Rev	Description of Change	Originator	Reviewer	Source File	Source SOP	Effective Date
0	Initial Release	ACB-240	ELF-302 DLM-349	MAN-M0011-R0.docx	M0011	06/01/20
1	Added COVID-19 Employee Disclosure and Employer Notification procedure, Close Contact Tracing procedure and FORM, Investigation procedure and FORM, Voluntary and Required Testing Strategy, FORM-N0129A, & Attachment 4	ACB-240	ELF-302 DLM-349 JPG-343	MAN-M0011-R1.docx	M0011	08/03/20
2	Updated Close Contact Definition, Primary and Secondary Symptoms, PRT Responsibilities, Hyperlinks, Disinfectant Used, Disinfection and Cleaning Procedure, Language from 'Employee' & 'Staff' to 'Team Member', Regulatory References, Risk Assessment Criteria, Notification Process, Return to Work Criteria, Attachments 1, 2, 3 & 4; Corrected Revision History Table Numbering; Added MIOSHA Contacts, Additional Workplace Controls, PIC Designations, Policy Prohibiting On-Site Work When Remote Work is Feasible; Removed Reference to Governor's EOs	ACB-240	JPG-343 AXG-359	MAN-M0011-R2.docx	M0011	11/20/20

Revision Approval

Authority:	Angella C. Breitenbeck, Executive Vice President of Administration
	(Name and Title)

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Table of Associated and Related Documents by Type and Reference

Type	Procedure	Title / Topic
MAN	M0002	Employee Handbook
MAN	M0007	Respiratory Protection Program (RPP)
MAN	M0002AD	Employee Manual Addendum: EPSL and EFMLA Policies In Response to COVID-19
FORM	M0002P	Acceptable Use of Information System Policy Agreement
FORM	M0002Q	Request for Emergency Paid Sick Leave under FFCRA (COVID-19)
FORM	M0011A	Arrival Body Temperature Check and COVID-19 Screening Questions
FORM	M0011B	On-Site Visitor COVID-19 Screening Questionnaire
FORM	M0011C	Suspected COVID-19 Case Form for Team Members / Visitors Presenting Symptoms
FORM	M0011D	COVID-19 Team Member Self-Certification to Return to Work
FORM	M0011E	Short-Term Telecommuting Agreement
FORM	M0011F	Disinfection and Cleaning Audit
FORM	M0011G	Team Member Pandemic Response and Action Plan Training Acknowledgement
FORM	M0011H	COVID-19 Close Contact Tracing Form
FORM	M0011I	COVID-19 Investigation Form
FORM	S0048C	Medical Treatment Waiver
FORM	N0129A	Expense Reimbursement Form
REF	M0011A	Team Member Daily Self-Screening Assessment
REF	M0011B	Pandemic Response and Action Plan Training

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1.0 SCOPE AND APPLICATION

Paragon Laboratories, Inc. ('Paragon') is an organization which performs critical infrastructure work as defined by the Director of the U.S. Cybersecurity and Infrastructure Security Agency in his guidance of March 19, 2020, on the COVID-19 response. Specifically, Paragon performs work for the following critical infrastructure segments: Energy; Water and Wastewater, and must remain open for testing to serve these critical infrastructure industries.

Paragon is committed to keeping our team members, customers, and suppliers safe while performing essential on-site or off-site work at each of our facilities and in the field. Because there may be circumstances unique to specific locations, there may be cases in which we must adopt the recommendations of this manual to address specific requirements. Additionally, a pandemic response plan cannot be written to cover every possible situation, and any exceptions to the guidance in this manual must be approved by Senior Leadership. The company reserves the right to take any action outside of what is expressly set forth in this handbook. Further, all facilities must comply with all applicable laws. If there is a conflict between the recommendations in this manual and the applicable law, the facility must follow the applicable law.

As we continue to navigate this new normal, we have tapped into Human Resources, Health and Safety, Information Technology, and Operations teams to develop resources which lay out processes to raise awareness of new health and well-being protocols and potentially helpful practices for cross-functional teamwork, operating discipline and training for team members.

This manual includes practical recommendations, based on guidelines from the Centers for Disease Control and Prevention (CDC); the World Health Organization (WHO); Occupational Safety and Health Administration (OSHA); and the federal, state, and local government; to address various scenarios we may face when performing work during the pandemic period. This is a working document, and it will be updated to reflect changes in directives and introduce new recommended practices as they become available.

This manual covers a wide range of topics, including but not limited to setting up a pandemic response team; cleaning and disinfection procedures; staggering shifts and team member breaks, and other social distancing strategies; on-site health screenings; and protocols for isolating team members who become ill at work.

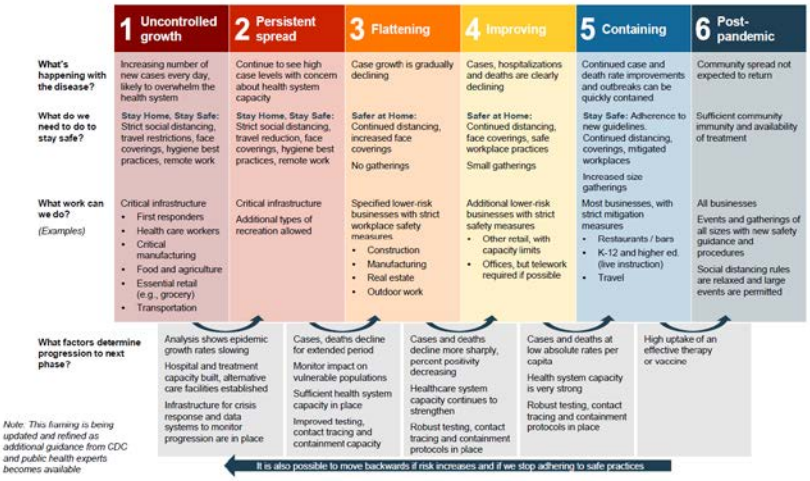
While Paragon will implement various protocols to ensure worker safety, it's up to each team member to execute these protocols daily. By releasing this manual, we are communicating our plans and expectations, highlighting workplace protocols to protect your safety and to maintain the comfort level for all team members as we gradually increase the number of team members working on-site. Paragon understands that every team member's situation is different and encourages those with specific risks or concerns to reach out to their direct supervisor or Human Resources to discuss alternate arrangements, should they be necessary.

The protocols in this manual incorporate and/or supersede all pandemic protocols put into place and distributed by corporate email between March 11, 2020, and the effective date of this document.

This manual is intended to work in conjunction with the Employee Handbook (MAN-M0002); however, certain pandemic policies will supersede Employee Handbook policies for the duration of the pandemic period, such as Hours of Operation, Staff Schedules, Meal Breaks, Rest Breaks, Time Off, etc.

2.0 RESUMING ON-SITE WORK

Due to the evolving nature of the COVID-19 pandemic, creating an exact timeline for resuming "normal" operations is not feasible. The MI Safe Start Plan provides an outline that identifies pandemic stages, actions to be taken, work which may be performed, and factors for stage progression/regression. Based on this model, Paragon will implement a phased approach to transition telecommunting team members to on-site work slowly and gradually loosen social distancing measures as advised by applicable federal, state, and local guidance.



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3.0 FACILITY OPERATING PROTOCOLS

3.1 PANDEMIC RESPONSE TEAM (PRT)

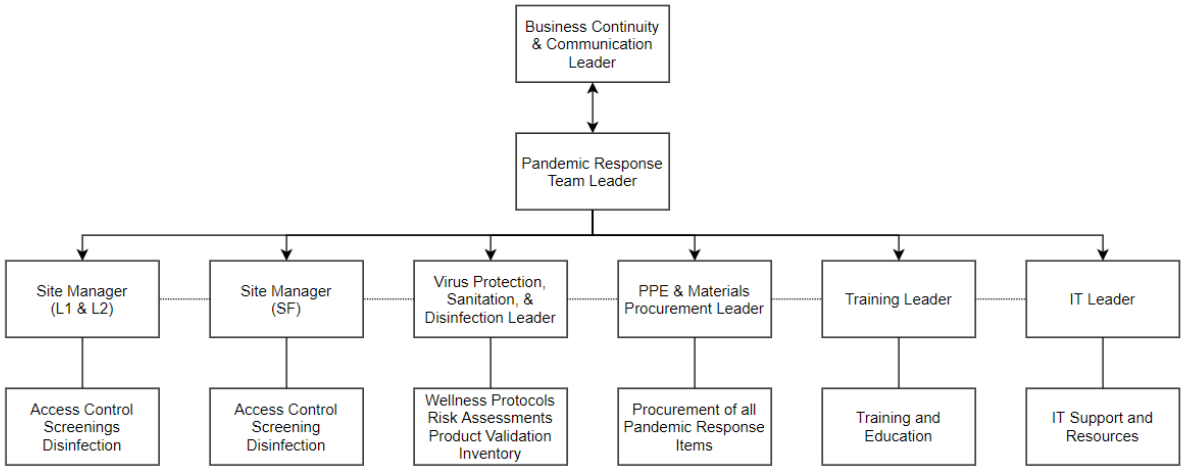
The Pandemic Response Team (PRT) is a cross-functional team lead by the Executive Vice President (EVP) of Administration. The EVP of Administration will take direction from and work closely with the President to ensure continuity of operations.

The EVP of Administration will assign and coordinate with PRT Leaders in the following categories:

- Business Continuity and Communication
- Site Management
- Virus Protection, Sanitization, and Disinfection
- PPE and Materials Procurement
- Training
- Information Technology

The Pandemic Response Team will meet as needed, virtually or in person, to discuss and resolves issues.

3.2 RESPONSIBILITIES



Business Continuity and Communication Leader – President: Has overall responsibility for determining and communicating the business direction during the pandemic period to team members, customers, vendors, and visitors.

PRT Leader – EVP of Administration: Has overall responsibility for the organization's Pandemic Response and Action Plan, coordinating and aligning with guidance from regional/global health and safety authorities in conjunction with requirements from federal, state, and local government; coordinates communication around probable and/or confirmed team member COVID-19 exposure events and diagnosis; facilitates organizational contact tracing and investigations with EHS, HR, and Site Managers; and facilitates team member COVID-19 testing as desired or necessary.

Site Manager (L1 and L2) – Vice President of Laboratory Operations: Manages social distancing logistics for team members or visitors upon arrival and departure; manages daily health screenings for on-site team members and/or visitors; supports the Virus Protection, Sanitization, and Disinfection Leader by providing site-specific options for social distancing within the site, including potential mitigation measures to manage safety risks for team members required to work less than 3-feet from others; and manages daily and weekly disinfection logistics and processes to ensure 100% compliance.

Site Manager (Southfield) – President: Manages social distancing logistics for team members or visitors upon arrival and departure; manages daily health screenings for on-site team members and/or visitors; supports the Virus Protection, Sanitization, and Disinfection Leader by providing site-specific options for social distancing within the site, including potential mitigation measures to manage safety risks for team members required to work less than 3-feet from others; and manages daily and weekly disinfection logistics and processes to ensure 100% compliance.

Virus Protection, Sanitization, and Disinfection Leader – Environmental Health and Safety [EHS] Coordinator: Works with Site Managers to develop protocols to ensure the wellness of all team members; conducts risk assessments and proposes/implements risk mitigation measures; supports the PRT Leader in the development and maintenance of the Pandemic Response and Action Plan; supports the Site Managers by performing audits of Paragon's disinfection protocols to ensure 100% compliance; maintains an inventory of PPE and

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sanitization/disinfection products; and supports the PPE and Materials Leader by validating and/or sourcing suitable PPE and cleaning products.

PPE and Materials Leader – Buyer: Sources and secures all necessary supplies to implement and sustain the Pandemic Response and Action Plan, including the procurement of site-specific items as needed; supports the EHS Coordinator with validating suitable PPE, validating cleaning products, and maintaining an inventory of PPE and sanitization/disinfection products.

Training Leader – EHS Coordinator: Develops training materials, holds virtual or in-person training sessions for team members, manages organization-wide training related to the Pandemic Response and Action Plan. The Human Resources (HR) Manager will provide training support for new team members during orientation, or as needed.

Information Technology Leader – IT Manager: Ensures team members have access to technology and resources to swiftly and effectively move between on-site and off-site work.

3.2.1 Additional Workplace Controls

Paragon will designate one or more worksite COVID-19 safety coordinators to implement, monitor, and report on the COVID-19 control strategies developed under the Department of Labor and Economic Opportunity COVID-19 Workplace Safety Guidance and implemented by way of Paragon's Pandemic Response and Action Plan.

For purposes of the manual, the COVID-19 safety coordinator(s) will be referred to as Person-In-Charge (PIC).

Assignment and distribution of PIC responsibilities will ensure that one (1) PIC is on-site at all times when team members are present on-site.

Due the number of team members working on-site at Livonia 1, and to accommodate staggered shifts, PIC assignment is clearly identified on the shared Google sheet named 'L1 Staggered Shift Schedule'. PIC designation is indicated by the letters 'PIC' included in the schedule of the corresponding team member. As additional support, a whiteboard located at Livonia 1 in the Sun also indicates the PIC at various points throughout the day.

Person-in-Charge (PIC)	Location	PIC Schedule	Responsibility Level
Dave Mote	Livonia 1	M - F; 6:30 AM to 7:30 AM	Primary
Jeff Glaser	Livonia 1	M - F; 7:30 AM to 4:00 PM	Primary
Adam Bortolussi	Livonia 1	M - F; 4:00 PM to 6:00 PM	Primary
Jordan Antongiorgi	Livonia 1	Sa; 7:00 AM to 3:30 PM	Primary
Nick Miller	Livonia 1	Su; 7:00 AM to 3:30 PM	Primary
Erica Francis	Livonia 1	Varies, as needed	Secondary
Manal Kandah	Livonia 1	Varies, as needed	Tertiary
Allen Luebke	Livonia 1	Varies, as needed	Tertiary
Alan Gregory	Livonia 1	Varies, as needed	Tertiary
John Kerr	Livonia 2	M - F; 7:00 AM to 4:00 PM	Primary
Jalpa Patel	Livonia 2	Varies, as needed	Secondary
John Parmentier	Southfield	M - F; 9:00 AM to 2:00 PM	Primary
Sheraz Bakhsh	Southfield	Tu/Th; 7:00 AM to 4:00 PM	Secondary
Angella Breitenbeck	Southfield	Varies, as needed	Tertiary

**Paragon reserves the right to adjust PIC assignments as necessary based on scheduling conflicts and/or instances when multiple team members are absent from the workplace simultaneously.*

3.3 CLEANING, DISINFECTING, AND PPE SUPPLY INVENTORY

As commercially available, Paragon will maintain at least a 30-day supply of consumable items such as soap, disinfecting spray, hand sanitizer/wipes, paper towels, facial tissue, disposable face masks, gloves safety glasses, and face shields.

Portable or mounted disinfectant stations are recommended for each facility and are to be located in common areas and near high touch surfaces.

Items may be procured from any supplier as long as the product meets the minimum specification.

Preferred suppliers and products are listed where available. Alternative surface disinfection and sanitization products must be cross-referenced with EPA List N disinfectants for use against SARS-CoV-2 or include an emerging viral pathogen claim from the manufacturer, as applicable. Alcohol-based hand rubs will not be included on EPA List N, but rather are regulated in accordance with FDA standards, and are to contain greater than 60% ethanol or 70% isopropanol as active ingredients in accordance with CDC recommendations.

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Item	Preferred Supplier	Product Information & Specification(s)	Minimum Quantity
Face mask (medical, clean room, or industrial)	Any; has available stock	Disposable, non-sterile, 1-day use	30-day supply
Respirator Mask (N95, P95, KN95)	Any; has available stock	N95, P95, or KN95 respirators (priority is for on-site isolation if COVID-19 suspected, and routine lab work which uses silica gel; N95 & P95 preferred to KN95)	30-day supply
Hand Sanitizing Wipes	Any; has available stock	PDI Sani-Hands; or equivalent (prioritized for off-site field service activities)	1 tub per vehicle; 30-day supply
Portable Hand Sanitizer	Any; with available stock	Contain >60% ethanol or >70% isopropanol	1 unit per room; 30-day supply
Surface Disinfectant Wipes	Any; with available stock	CaviWipes; Clorox Wipes; or EPA List N alternate (prioritized for off-site field service activities)	1 tub per vehicle; 30-day supply
Infrared Thermometer	Any; with available stock	Non-contact, measures ranges 89.6°F – 108.5°F (32°C to 42.5°C)	1 per location
Mask Disposal Bags	Any; with available stock	Twist closure; Paper or HDPE	30-day supply
Disinfectant Spray + Spray Bottles	Any; with available stock	EPA List N disinfectant, or manufacturer provided emerging viral pathogen claim against SARS-CoV-2 (prioritized for on-site disinfection)	1 bottle per room; 30-day supply
Wall Mounted Sanitizer	UniFirst	Purell, >60% ethanol or >70% isopropanol	30-day supply
Hand Soap Refill	UniFirst	Antibacterial hand soap	30-day supply
Paper Towel	UniFirst	Tri-fold hand towel	30-day supply
Facial Tissue	UniFirst	Facial tissue	30-day supply
Gloves (latex or nitrile)	VWR	Disposable, non-sterile, exam gloves (XS, S, M, L, XL)	30-day supply
Face Shields	Grainger	Polycarbonate, impact-resistant	30-day supply

3.4 PPE UTILIZATION REQUIREMENTS

Face Masks [disposable] will be provided to team members by the company for use during working hours. Each team member is provided one (1) mask per 4-hours worked, and a new mask is required each working day**.**

Paragon requires* face masks to be worn completely covering the nose and mouth when team members are in a shared space in any Paragon facility. Shared spaces are defined as any room or space which is occupied by more than one person, regardless of the size of the room or space and location of the individuals. This includes, but is not limited to, hallways, restrooms, common areas, in-person meetings, the Sun, bottle preparation/sorting spaces, and all laboratory areas.

For more information on how to properly wear a face mask refer to CDC guidance.

At a minimum, masks are to be replaced each working day. Masks are recommended to be replaced; after 4-hours of use, or if the face mask is damaged or soiled, or if breathing through the mask becomes difficult.

For the health and safety of each team member, and to limit the exposure of others to a potentially contaminated used mask, individuals will be provided with a mask disposal bag daily, as needed. Each team member is responsible for placing their own used mask(s) in their personal mask disposal bag and taking the used mask(s) home for disposal as general refuse daily.

Team member acquired face masks may be used in lieu of a company-provided mask, provided it is equivalent or better. For example; all surgical masks, KN95, N95, and P95 masks are acceptable, provided they do not have an exhalation valve. Homemade and/or cloth masks are prohibited in the workplace. All face coverings must be maintained in accordance with CDC guidelines, as applicable.

*[**Note:** *If a team member is not able to medically tolerate a face mask, please contact HR. A doctor's note may be required to certify the need for accommodation.]*

Face Shields may be worn as a precautionary measure when team members work within 3-feet of each other. A face mask should be worn with the face shield to limit exposure risk. Using a face shield without a face mask as a mitigation technique is not authorized.

*[**Note:** The use of general-purpose face masks, and in some cases face shields, is required by the MDHHS and recommended by the CDC as an additional public health measure to reduce the spread of COVID-19. Masks are intended to reduce the emission of virus-laden droplets and to help reduce inhalation of these droplets by the wearer. The benefit of masking is due to the combination of these effects; individual prevention benefit increases with increasing numbers of people using masks consistently and correctly. The use of face masks is required in Public Act (PA) 238, the Michigan Department of Health and Human Services (MDHHS) Epidemic Orders series, and the Department of Labor and Economic Opportunity COVID-19 Workplace Safety Guidance.]*

Respirator Masks (N95, P95, or KN95) will be provided when available for commercial, non-healthcare, purchase and prioritized for team members who become symptomatic while working, members of the Pandemic Response Team or Leadership personnel who attend to workers who become symptomatic at work, and for analytical analysis involving silica gel.

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*[**Note:** Individuals using respiratory protection should always carefully read and follow the instructions for the model of respirator used, be clean-shaven, and follow the proper donning instructions for best fit. If the proper fit is not achieved, the level of protection from the respirator will be impaired. Refer to Paragon's Respiratory Protection Program (MAN-M0007) for additional guidance.]*

Gloves will be provided by the company and are to be used as needed to reduce direct contact with high touch surfaces, such as doorknobs, light switches, and mail. Proper donning and doffing of contaminated gloves are critical to minimize exposure risk.

Face masks and gloves are readily available at the designated entrance at Livonia 1, Livonia 2, and Southfield. The Site Manager and/or the Virus Protection, Sanitization, and Disinfection Leader will notify the PPE and Materials Leader when PPE needs to be reordered.

For training on proper donning and doffing of PPE, please contact Paragon's EHS Coordinator.

3.5 HAND HYGIENE AND RESPIRATORY ETIQUETTE

Hand hygiene and respiratory etiquette are effective ways to prevent the spread of the virus that causes COVID-19.

3.5.1 Hand Washing

Wash your hands often and at crucial times such as: before touching your eyes, nose, and mouth; after touching a high contact item such as a doorknob or light switch; when preparing food; before eating; after using the restroom; after blowing your nose, coughing, or sneezing; after handling garbage; etc.

Follow these five steps every time:

- **Wet** your hands with clean, running water (warm or cold), turn off the tap, and apply soap.
- **Lather** your hands by rubbing them together with the soap. Lather the backs of your hands, between your fingers, and under your nails.
- **Scrub** your hands for at least 20 seconds.
- **Rinse** your hands well under clean, running water.
- **Dry** your hands using a clean towel or air dry them.

3.5.2 Hand Sanitizer and Hand Sanitizing Wipes

Use an alcohol-based (1) hand sanitizer or (2) hand sanitizing wipe that contains at least 60% alcohol when access is soap and water is not available.

- **Apply** sanitizer or wipe to your hands.
- **Rub** your hands together, or rub the wipe thoroughly over the fingernails, fingers, palms, and backs of both hands for 20 seconds or until dry.

3.5.3 Respiratory Etiquette

Respiratory etiquette aims to limit the transmission of respiratory pathogens spread by droplet or airborne routes by the following four steps.

- **Cover** your mouth and nose with a tissue when you cough or sneeze.
- **Throw** used tissues in the trash.
- **No Tissue?** Cough or sneeze into your elbow, not your hands.
- **Wash** your hands for 20 seconds or use hand sanitizer.

3.6 DISINFECTION REQUIREMENTS

Team members are to clean and disinfect all areas of the facility as scheduled with particular attention to:

- Analytical Equipment and Tools
- Workstations
- Office Equipment
- Floors and Counters
- Restrooms
- Lunchroom and Water Cooler
- Common Surface Areas
- Computer Screens and Keyboard

In addition to these disinfection activities, proper personal sanitary practices, including washing hands after restroom use, is also necessary. Hand washing should follow CDC recommendations for proper hand hygiene. Refer to section 3.5 for additional guidance.

3.7 DISINFECTION FREQUENCY AND SCHEDULE

A general summary of disinfection procedures is below.

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Location	Daily Disinfection Tasks	Disinfectant	Disinfection Method	Daily Frequency
Vestibule	Door handles, locks, podium surface, shelving unit, bins, lids, contact points, etc.	EPA List N disinfectant or emerging viral pathogen claim against SARS-CoV-2 (contact time varies by product)	Spray directly and wipe	Minimum 2x per day
Lobby/Reception Areas	Door handles, light switches, alarm key pad, time clock, supply closet, workstations, general use office technology, tables, chairs, contact points, etc.		Electronics - Saturate paper towel & wipe; Surfaces - Spray directly & wipe	Minimum 2x per day
Meeting Rooms and Offices	Door handles, light switches, conference phone, AV equipment, coffee maker, tables, chairs, workstations, technology		Electronics - Saturate paper towel & wipe; Surfaces - Spray directly & wipe	Minimum 2x per day
Hallway	Door handles, light switches, wall sanitizer levers, water cooler faceplate and buttons, etc.		Spray directly & wipe	Minimum 2x per day
Restrooms	Toilet handles, stall latches, stall handles, urinal handles, cabinet handles, faucets, door handles, light switches, contact points, etc.		Spray directly & wipe	Minimum 2x per day
Lunchroom	Door handles, light switches, refrigerator handles, tables, chairs, small appliance control panels & handles, contact points, etc.		Electronics - Saturate paper towel & wipe; Surfaces - Spray directly & wipe	Minimum 2x per day
Laboratory Areas (All Facilities)	Door handles, light switches, lab benches, workstations, equipment, instrumentation, technology, contact points, etc.		Electronics - Saturate paper towel & wipe; Surfaces - Spray directly & wipe	Minimum 2x per day
Field Service Vehicles	Sanitize steering wheel, vehicle controls, door handles, contact points	EPA List N disinfectant or Disinfecting Wipe	Spray directly or wipe	Minimum 1x per day if same operator; or 1x per shift
Floors and Walls	Vacuum, sweep, and wet mop as appropriate	EPA List N disinfectant	Spray directly and mop or wipe	As needed
Location	**Weekly Disinfection Tasks**	**Disinfectant**	**Disinfection Method**	**Weekly Frequency**
Hallway	Sweep and wet mop	EPA List N disinfectant or emerging viral pathogen claim against SARS-CoV-2 (All areas must be cleaned using general-purpose cleaning products prior to disinfection)	Spray directly & wipe or mop	Minimum 1x per week
Restrooms	Toilet bowl, toilet seat (top and underside), sinks, counter, sweep and wet mop floor, contact points, walls, etc.		Spray directly & wipe or mop	Minimum 1x per week
Lunchroom	Sinks, counter, sweep and wet mop floor, contact points, walls, etc.		Spray directly & wipe or mop	Minimum 1x per week
Laboratory Areas (All Facilities)	Sinks, counter, sweep and wet mop floor, contact points, walls, etc.		Spray directly & wipe or mop	Minimum 1x per week
Warehouse	Sinks, counter, sweep and wet mop floor, contact points, walls, etc.		Spray directly & wipe or mop	Minimum 1x per week

Detailed 'Daily' and 'Weekly' checklists are shared with applicable team members via Google Sheets to facilitate disinfection and cleaning compliance at Livonia 1, Livonia 2, and Southfield. Weekly checklists may include general cleaning activities, such as dusting and/or polishing, which are not included in the disinfection schedule above but are also required to be completed.

PPE is to be used during the disinfection process as determined by the hazards present, if any, in chemicals used. SDSs for cleaning and disinfection chemicals are available from the Virus Protection, Sanitization, and Disinfection Leader.

Due to the challenges involved in obtaining EPA List N Disinfectants during the pandemic period, the disinfection product may change from time to time. Always review the product instructions or label prior to use to ensure dilution scheme (for concentrated products) and contact time requirements are observed. For assistance, contact the EHS Coordinator.

Daily - Team members are responsible for cleaning the areas they work in or frequent a minimum of two (2) times per day as indicated on the 'Daily' Disinfection and Cleaning Schedule for each Paragon facility (Livonia 1, Livonia 2, Southfield). Once an area is disinfected and/or cleaned, a check mark is placed in the corresponding section along with the initials of the team member(s) performing the work. Repeated failure to clean and disinfect your work area, or common areas you frequent, or properly record cleaning activities will result in corrective action.

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Weekly - Team members are responsible for cleaning the areas they work in or frequent (i.e. common spaces) once per week. Weekly cleaning of common spaces (e.g. hallway, restrooms, lunchroom, etc.) will be assigned to rotating teams by the Site Manager. Once an area is disinfected and/or cleaned, a check mark is placed in the corresponding section along with the initials of the team member(s) performing the work. Weekly disinfection and cleaning activities are assigned at Livonia 1 and Livonia 2 only. The Southfield office space includes janitorial service which performs the weekly tasks on our behalf. Repeated failure to clean and disinfect your work area, or common areas you frequent, or properly record cleaning activities will result in corrective action.

Both 'Daily' and 'Weekly' cleaning checklists are reviewed daily by the Site Leader(s) to ensure all tasks are completed thoroughly and on schedule. Incomplete tasks (non-conformances) must be investigated and detailed explanations provided in the Notes section of the checklist when observed. Repeated failure to ensure cleaning and disinfections activities are occurring in real time as assigned will result in corrective action.

The Virus Protection, Sanitization, and Disinfection Leader will audit the daily and weekly cleaning protocols weekly. Audits will be conducted and recorded using FORM-M0011F (Disinfection and Cleaning Audit). Due to the critical need for disinfection during the pandemic period, all non-conformances are to be resolved within seven (7) calendar days.

3.8 DEEP CLEANING AND DISINFECTION

For the purposes of this manual, deep cleaning is defined as a more comprehensive cleaning using advanced technologies (when available) and more aggressive cleaning solutions. It is recommended to utilize an external third party experienced in Coronavirus remediation whenever possible. When using a third party, the company should have trained personnel to clean, disinfect, and dispose of any hazardous waste generated during cleaning; proper equipment, and PPE to perform the task; and use of approved COVID-19 disinfectant chemicals to perform the activity.

"Deep cleaning" and disinfection are triggered when an active team member is identified as being COVID-19 positive based on testing. Paragon may opt to have a deep cleaning performed for presumed cases, at our discretion.

Deep cleaning should be performed as soon as practical after the confirmation of a positive test. If a delay is expected past the end of a shift, the on-site leaders should gain consensus from the PRT and Virus Protection, Sanitization, and Disinfection leaders and take steps to perform additional disinfection of potentially impacted common surfaces during the interim period.

While the scope of deep cleaning is presumed to be the full site, the footprint for deep cleaning may be reduced if there is sufficient rationale to do so, and consensus from the PRT and Virus Protection, Sanitization, and Disinfection leaders is in agreement.

Notwithstanding the above, if an active team member is confirmed to have a COVID-19 positive test, in lieu of performing deep cleaning, a 72-hr shut down period will allow for natural deactivation of the virus, which is to be followed by site personnel performing comprehensive disinfection of all common surfaces. A site shut down must be approved by the President, who is responsible for Business Continuity and Communication.

Members of the PRT will coordinate and supervise the deep cleaning and disinfection process, ensuring that:

- There is a specific plan and strategy to clean all or designated facility areas including, instrumentation/equipment, common areas, offices, and any areas where team members interact
- Only authorized individuals can access the site during the cleaning operation
- Any third-party vendor or contractor must use all required PPE and ensure that it is properly disposed of at the end of the process
- Assure that team members are made aware that the work areas have been disinfected

3.9 INBOUND MATERIALS, PACKAGES, AND MAIL

Paragon has implemented a non-contact drop zone for all deliveries, including mail, packages, samples, and delivered meals. All customers must provide advance notice of need(s) when dropping off samples directly at the facility by calling the Account Coordination Team prior to arrival. Facility access is strictly limited to essential team members and service providers.

According to the World Health Organization (WHO), it is safe to receive packages from areas where COVID-19 has been reported, advising that:

"The likelihood of an infected person contaminating commercial goods is low, and the risk of catching the virus that causes COVID-19 from a package that has been moved, traveled, and exposed to different conditions and temperature is also low."

The virus does not survive on surfaces for long, and the length of shipment time and other environmental factors should inactivate the virus.

If expedited packages or mail deliveries are received from an area where COVID-19 is present, and there is concern about possible surface contamination, consider these steps:

- Wash your hands frequently with soap and water
- Use hand sanitizer when soap and water are not available
- Use PPE such as disposable nitrile or latex gloves and properly discard after use

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- Avoid touching your face, eyes, nose or mouth

If packaged materials have been in transit and/or stored at the site for more than 48-hrs from last human contact, no further action is needed. While not necessary, if team member apprehension remains high, follow additional optional precautions:

- Use PPE, such as disposable nitrile or latex gloves and/or a disposable face mask
- Disinfect surfaces with an EPA List N disinfectant or product with an emerging viral pathogen claim against SARS-CoV-2; follow contact time recommendations as indicated by the product use instructions to ensure complete deactivation/degradation of potentially infective virus particles

3.10 RIDESHARING

Ridesharing or carpooling is strongly discouraged unless the individuals live in the same household. Included in this are team members that carpool to/from work and team members that use meal periods to get food or run other errands together.

In addition, if team members must visit a customer site to conduct work, each team member must travel in a separate vehicle.

Further, we request team members to limit their use of shared ride services like buses, taxis, Uber, Lyft, and others. Refer to the CDC guidance on What Rideshare, Taxi, Limo, and other Passenger Drivers-for-Hire Need to Know about COVID-19 for more information.

If public transportation, ridesharing, or carpooling is used, team members are strongly encouraged to utilize appropriate PPE, practice proper social distancing, and refrain from touching their faces until after adequate hand hygiene is performed.

3.11 ON-SITE ISOLATION PROTOCOL

If a person feels ill or if someone observes that another person is exhibiting symptoms of COVID-19 at work, contact a member of the Pandemic Response Team* or Leadership personnel* as soon as possible.

**For the purposes of the On-Site Isolation Protocol, the individual who provides aid to the suspected infected individual is referred to as the Responder.*

Telephone or email communications are preferable so that the Pandemic Response Team Member or Leadership personnel can don appropriate PPE (preferably an N95 respirator) prior to providing aide to an ill team member.

The Isolation Room should be an enclosed area away from the general population. Ask the team member with the suspected COVID-19 infection to proceed to the Isolation Room by the most direct route. Isolation rooms by facility are listed below for reference.

Livonia 1 – Conference Room in Sun (roll AV equipment out of the room prior to use as the Isolation Room whenever possible)
Livonia 2 – Unused Room (across the hallway from the Office or Laboratory space)
Southfield – Room #2 (Record storage room)

Refer to Attachment 1 for a COVID-19 Symptom Check and Reporting Flow Chart.

3.11.1 Isolation Procedure:

1. Once the suspected infected team member arrives in the Isolation Room, immediately provide them with a mask (or preferably an N95 respirator) and latex or nitrile gloves. Explain to them that it is to help protect other team members and prevent the spread of potential virus.

2. The Responder must complete a Suspected COVID-19 Case Form (FORM-M0011C) and call the local health authority or medical office to seek advice regarding transportation and location.

   - *Michigan Department of Health and Human Services (MDHHS) COVID-19 Hotline:* **1 (888) 535-6136** [M-F; 8:00 AM – 5:00 PM]
   - *Ascension Providence Health Center, Livonia:* **1 (734) 432-6668** [M-F; 7:30 AM – 4:00 PM]
   - *Wayne County Coronavirus Information Number:* **211** or **1 (734) 287-7870**
   - *Oakland County Health Division Nurse on Call Hotline:* **1 (800) 848-5533**

3. The Responder, and any others attending the suspected infected person, should also wear a protective mask (preferably an N95 respirator) and latex or nitrile gloves while working with the suspected infected person.

4. The Responder should direct the ill team member to leave work and go home or to the nearest health center as advised by the local health authority. Public transportation should not be used.
   i. If the suspected infected person is well enough to drive their own vehicle, ask them to use it and ask if the ill individual would like to have a Responder follow them in a separate vehicle to their destination.
   ii. If the Responder is to transport the person in another vehicle, ensure that the infected person always keeps the mask on their face and wears a pair of gloves.
   iii. The driver must wear a mask and gloves during the entire trip, removing and properly disposing of them after returning to the site.

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iv. Once the vehicle has returned to the site, ensure that it is cleaned and all surfaces, seats, dashboards, door handles seatbelts, etc., have been washed down with a disinfectant solution. All persons cleaning the vehicle must wear a mask and gloves while cleaning the vehicle.
v. If the suspected infected person is severely ill, call 911.
vi. If the ill team member refuses medical treatment as recommended by the local health authority or if the ill team member requests that a Responder follow them to their destination, have the ill team member complete FORM-S0048C (Medical Treatment Waiver).

5. The Responder, in coordination with HR and EHS, must:
   i. Identify persons who may have been in contact with the suspected infected team member. Unless required by the local health authority, the name of the infected team member should not be provided.
   ii. Advise team members that they may have been in contact with a suspected infected individual, and to carry out a self-screening check twice per day for fourteen (14) days or until able to receive a COVID-19 test, and based on the results, contact the HR Manager or their direct supervisor.
   iii. Advise team members to contact a physician to obtain medical clearance to return to work.

6. Ensure that both the isolation area and suspected team member's work station or office is thoroughly cleaned and disinfected, in addition to all other common surfaces recently touched by the infected individual. All persons carrying out this cleaning must wear disposable latex or nitrile gloves, and all support persons' PPE should be appropriately discarded prior to resuming normal work functions.

3.12 SOCIAL DISTANCING

Social distancing is a simple yet very effective mechanism to prevent potential infection, that relies on simple distance to avoid infection. In practice, this means:

- To the maximum extent possible, staying 6-feet away from others as a standard practice
- Maintaining a minimum of 3-feet distance if 6-feet cannot be consistently achieved
- Eliminating contact with others, such as handshakes or embracing co-workers, visitors or friends
- Avoiding touching surfaces touched by others, to the extent feasible
- Avoiding anyone who is coughing, sneezing or appears to be sick

3.13 DISTANCING STRATEGIES IN LABORATORY AND OFFICE SETTINGS

Social distancing the workplace is intended to provide a safe environment that reduces the risk of any potential person-to-person infection.

Until further notice, Paragon is:

1. **Prohibiting team members from performing in-person (on-site) work activities where the work activity can be feasibly completed remotely.** Refer to Attachment 3 for a summary of on-site work assignments by department and title, including a feasibility and 'strict requirement' assessment.
2. Restricting business-related travel for team members to essential travel only.
3. Suspending all non-essential in-person visits, including tours.
4. Reducing hours of operation for deliveries and customer sample drop-off/pick-up, as recommended by the Business Continuity and Communication Leader.
5. Staggering shifts and/or reducing team member hours to limit the number of individuals in the facility and reduce congestion at the time clock, as recommended by the Site Manager(s).
6. Strictly limiting the number of individuals permitted to assemble in conference or meeting rooms and common spaces at Livonia 1, Livonia 2, and Southfield by posting maximum occupancy signage next to the entrance of each area and removing chairs in excess of maximum occupancy limits.
7. Providing a 6-foot (72-inch) dowel rod at each facility to easily spot check distancing compliance, as necessary.
8. Restricting break times and limiting the number of team members on break simultaneously to allow for adequate physical distance as directed by the Site Manager(s).
9. As necessary and, to the extent practical, providing tape markings on the floor to demarcate socially distanced workspaces.
10. Minimizing contact of high touch surfaces by:
    i. Propping internal doors open where possible.
    ii. Implementing a proximity badge system to reduce touch contacts at the time clock.
    iii. Encouraging the use of a new disposable latex or nitrile glove for start-of-day clock-ins and end-of-day clock-outs.
11. Limiting gatherings to 10 people or less, provided strict social distancing is maintained, and face masks are worn.
12. Minimize the sharing of equipment, workstations, and items.
13. Strongly encouraging increased cleaning intervals (>2 times per day) in common areas (restroom, lunchroom, meeting rooms, etc.) and office equipment (keyboards, mice, chair armrests, copiers, printers, etc.) to ensure a clean environment.

3.13.1 Work Stations (Laboratory and Office)

To the maximum extent possible, work stations are arranged to allow separation of 6-feet. When 6-feet is not possible due to workplace design, a minimum of 3-feet must be maintained, and one or more mitigation strategies is to be implemented, including engineering, PPE, and/or administration controls as appropriate. Examples of mitigation strategies are included for reference:

- Avoiding face-to-face operations if the 6-foot requirement cannot be met

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- Face Masks
- Face Shields
- Body Orientation (i.e., back-to-back)
- Installation of physical barriers where practical; the barriers must be cleaned multiple times a shift

3.13.2 Risk Assessment

A comprehensive risk assessment was conducted by following and applying the methodologies provided by OSHA document 3990-03 2020, Guidance on Preparing Workplaces for COVID-19 in conjunction with state and local guidance provided in *Public Act (PA) 238, the Michigan Department of Health and Human Services (MDHHS) Epidemic Orders series, and the Department of Labor and Economic Opportunity COVID-19 Workplace Safety Guidance*.

In accordance with MISOHA Emergency Rules Coronavirus Disease 2019 (COVID-19) guidance, all job tasks and procedures performed by Paragon Laboratories, Inc. are categorized as low to medium exposure risk.

Job tasks and procedures categorized as low exposure risk are those that do not require contact with people known to be or suspected of being infected with SARS-CoV-2 nor frequent close contact (e.g., within 6 feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

Job tasks and procedures categorized as medium risk are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.

In accordance with CDC guidance, close contact is defined as “someone who was within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated”.

In applying this guidance to determine the occupational risk, the following assumptions are made:

- All active team members are performing their roles as traditionally assigned and scheduled (Livonia 1 - standard facility hours of 7:00 AM – 6:00 PM; Livonia 2 and Southfield – standard hours of 7:00 AM – 4:00 PM; minimal telecommuting; etc.)
- All team members are considered asymptomatic and infective
- “General Public” is interpreted to mean any team member or individual working on-site
- Team members are in close contact (<6-feet for 15 minutes or more cumulatively over 24-hours) throughout the workday
- The distance across laboratory benches is <6-feet [confirmed during risk assessment]
- Michigan is and will continue to be an area with ongoing community transmission
- Team members are following recommendations from health authorities and federal, state, and local government outside of work

Livonia 1, Livonia 2, and Southfield facilities were measured using a standard 25-foot tape measure to determine appropriate engineering controls, administrative controls, safe work practices, and PPE requirements. In addition, the distance between and across work stations was measured to ensure proper controls are implemented.

For additional information regarding the risk assessment, contact the EHS Coordinator.

3.14 DAILY SELF-SCREENING SURVEY

Paragon is concerned for your safety and the safety of your co-workers. In the interest of ensuring a safe and healthy work environment, we recommend that you voluntarily monitor your health status by carefully completing a self-screening assessment by asking yourself a series of questions prior to reporting to active work each day. A copy of the Team Member Daily Self-Screening Assessment (REF-M0011A) will be provided to you and is included as Attachment 2 for reference.

Comprehensive daily self-screening will prevent symptomatic team members from arriving at work and will potentially reduce person to person spread of the virus at the workplace.

3.15 ON-SITE HEALTH SCREENING

In accordance with state and local government requirements to control and reduce transmission of COVID-19, Paragon has implemented a daily screening procedure for all team members, service providers*, or visitors* entering the worksite. Team members who have, or are suspected of having close contact, as defined in 3.13.2, with an individual with a confirmed or probable case of COVID-19 may be asked to complete an on-site health screening twice each day.

**Paragon no longer allows regular visitation to our facilities until further notice. When essential or business-critical in-person visits must occur (i.e., hazardous waste removal, instrumentation repair, safety inspections, etc.), they should be in accordance with the company’s Pandemic Preparedness and Response Plan.*

On-site screening is **mandatory** until additional guidance is provided from the state and local government. Any team member, service provider, or visitor that refuses the screening will not be permitted on the premises and will be directed to leave the property. The individual will not be permitted to return to the premises until medical clearance has been obtained from a licensed health care provider, and an official certificate is provided to HR for review.

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On-site screenings are conducted by Leadership upon arrival at each facility using FORM-M0011A (Arrival Body Temperature Check and COVID-19 Screening Questions). The screening takes place individually in a private office to ensure confidentiality and proper social distancing. Records obtained during on-site screening are kept in strict confidence and stored in each team member's confidential medical file in accordance with COVID-19 record retention requirements.

On-site screening, which may include a body temperature check (non-contact thermometer) at Paragon's discretion, for service providers and visitors, is accomplished using FORM-M0011B (On-site Visitor COVID-19 Screening Questionnaire). Satisfactory screening is required prior to engaging in the activity for which the individual is on site. Entry will not be granted if the individual had known exposure to COVID-19 within the past 14 days or is exhibiting symptoms consistent with COVID-19. If the individual will be on-site for multiple days, a new form is required each day. Information obtained for service providers and visitors is stored in a secure On-site Visitor Screening file for one year. Hardcopy documents will be shredded, and electronic records will be destroyed following the retention period.

Satisfactory on-site screenings are required prior to beginning work each working day. If a team member is deemed symptomatic upon reporting to work, Paragon will direct the individual to leave the premises, obtain medical clearance, and provide an official certificate prior to returning to the premises. If a team member refuses to seek medical attention or is unable to provide medical clearance, Paragon will assume universal precautions as specified in OHSA Standard 1910.1030, Bloodborne Pathogens.

If a team member is deemed symptomatic during the workday or after the team member has spent any time in the facility (after the On-Site Health Screening), follow section 3.11, On-Site Isolation Protocol.

3.16 WORKER DISCLOSURE OF COVID-19 SYMPTOMS, EXPOSURES, AND/OR DIAGNOSIS

Early disclosure of COVID-19 symptoms, exposures, and/or diagnosis is critical to reducing the risk of COVID-19 outbreaks in the workplace.

To protect the health and safety of individuals on site at a Paragon facility, team members and visitors are required to disclose probable* and confirmed COVID-19 exposure events, probable* and confirmed COVID-19 diagnosis (i.e. positive test result), and symptoms related to COVID-19 as detailed on FORM-M0011A and FORM-M0011B, respectively.

**Probable COVID-19 exposure events and/or diagnosis must be identified by a health care provider or public health official. Paragon is unable to determine if any set of symptoms and/or circumstances indicate a probable COVID-19 exposure event or diagnosis.*

Acting from a basis of mutual trust, we ask that daily screening forms are filled out accurately, as intended, and in good faith.

We acknowledge that information about SARS-CoV-2, the virus that causes COVID-19, is changing rapidly and this may make it hard to know if a disclosure or other action is needed. If you are unsure about your circumstance(s), or the circumstance(s) of your cohabitant, please reach out to the HR Manager or your supervisor for guidance. We will be glad to assist you in selecting the appropriate course of action based on the details provided. All information shared will be treated as confidential to protect your privacy to the greatest extent possible.

3.17 EMPLOYER NOTIFICATION OF COVID-19 EXPOSURE EVENTS AND/OR COVID-19 DIAGNOSIS IN THE WORKPLACE

Paragon will take swift action to inform team members who performed work in a facility where a probable or confirmed exposure event or diagnosis (i.e. positive test result) was disclosed and will provide notification to team members within 24-hours of learning of the situation.

Following CDC guidelines, the generally accepted exposure window begins 2 days prior to symptom onset (if asymptomatic, 2 days prior to the date the positive specimen was collected) to the initiation of isolation.

- If you routinely, or intermittently, worked at L1 during an exposure window for a probable or confirmed COVID-19 event – you will receive an email notifying you of the situation
- If you routinely, or intermittently, worked at L2 during an exposure window for a probable or confirmed COVID-19 event – you will receive an email notifying you of the situation
- If you routinely, or intermittently worked, at Southfield during an exposure window for a probable or confirmed COVID-19 event – you will receive an email notifying you of the situation
- If you work remotely or were not present on site at a Paragon facility during an exposure window – you will not be notified

Contact tracing and an investigation will begin as soon as possible following worker disclosure. Team members identified as close contacts (section 3.18.1) of the disclosing worker will be notified as described above and then provided additional information using either a new email chain or alternate communication means. Communication methods will be selected as appropriate based on team member schedules, the day of the week, and the time of day. Regardless of communication method, additional information will include actions for the team members identified as close contacts to take which will include isolation and testing requirements, if applicable.

Employer notifications to team members will not be made in instances where the disclosing individual was not on site at a Paragon facility during the exposure window. These events will be tracked by HR with information provided to the supervisor as appropriate.

Paragon will disclose probable or confirmed exposure events and diagnosis to visitors who were onsite at the time of a COVID-19 disclosure. In addition, Paragon will inform the visitor if they were identified as a close contact following contact tracing review.

All efforts will be made to maintain team member confidentiality to the greatest extent possible.

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3.18 TESTING STRATEGY FOR CORONAVIRUS (COVID-19) IN THE WORKPLACE

Based on guidance from the CDC and public health authorities as of March 2020, the COVID-19 pandemic meets the criteria to be considered a "direct threat" under ADA standards. In this context a "direct threat" constitutes "a significant risk of substantial harm to the health or safety of the individual or others that cannot be eliminated or reduced by reasonable accommodation." Further, the ADA requires that any mandatory medical test of team members be "job related and consistent with business necessity." Applying this standard to the current circumstances of the COVID-19 pandemic, Paragon may take steps to determine if team members entering the workplace have COVID-19 because an individual with the virus will pose a direct threat to the health of others. Additionally on May 19th, 2020, OSHA published Revised Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19) which now requires all employers to report work related COVID-19 exposures as a recordable illness on Form 300.

To this end Paragon will offer, and in some cases require, COVID-19 viral testing for team members.

Viral testing detects infection at the time the sample is collected which may result in a negative test result being obtained early on in an infection. Due to this limitation, Paragon may request or require serial testing (i.e. testing at different points in time) based on exposure details. Paragon will also provide voluntary testing to any team member desiring to be tested.

When seeking required or voluntary testing, Paragon will reimburse each team member for fees incurred as a result of viral COVID-19 testing. Please have the testing performed using your health insurance, if applicable, and submit an Expense Reimbursement Form (FORM-N0129A) to the HR Manager for approval and submission. Paragon reserves the right to specify the testing location. To request voluntary testing, please email the HR Manager for additional information.

Antibody tests will not be offered or required as a condition of employment in accordance with U.S. Equal Employment Opportunity commission (EEOC) guidance.

Paragon encourages team members that are disinclined to participate in required testing to have a conversation with their supervisor or the HR Manager about why the testing is necessary. Continued refusal of mandatory testing may be subject to disciplinary action or exclusion from the workplace until the testing is completed.

Refer to Attachment 4 for a high-level overview of Paragon's isolation and testing strategy protocols. For detailed guidance refer to sections 3.18.1 and 3.18.2.

3.18.1 Isolation, Contact Tracing, and Investigation Strategy

(a) **Probable or confirmed COVID-19 diagnosis** is identified in the workplace – disclosing team member will be asked to isolate at home until the criteria is met to discontinue home isolation (section 3.20.2). Paragon will request close contact tracing (FORM-M0011H) and begin a COVID-19 investigation (FORM-M0011I) to determine if the exposure event is work-related. Following CDC guidelines, when symptomatic cases are identified, contact tracing is to include the period from 2 days BEFORE symptom onset to the time isolation is initiated. In the case of asymptomatic cases, contact tracing is to include the period 2 days BEFORE the first specimen was collected which resulted in a positive viral test result to the time isolation is initiated.

*[**Example:** (1) Team member A is advised by a health care provider or public health official that based on the circumstantial details provided, Team member A probably has an active COVID-19 infection or diagnosis; **OR** (2) Team member A received a positive COVID-19 viral test result.]*

(b) **Probable or confirmed COVID-19 exposure event** is identified in the workplace – disclosing team member will be asked to isolate at home for 14 days from the last known exposure date. Paragon will request close contact tracing (FORM-M0011H) and begin a COVID-19 investigation (FORM-M0011I), as described above, if at any point during the 14-day isolation period the team member develops symptoms or obtains a positive test result (section 3.18.2b), to determine if the infection is work-related.

*[**Example:** (1) Team member B is advised by a health care provider or public health official that based on the circumstantial details provided, Team member B probably has been exposed (<6 ft for 15 minutes or more cumulatively over a 24-hour period) to an individual with an active COVID-19 infection or diagnosis; **OR** (2) Team member B received notification that they were exposed (<6 ft for 15 minutes or more cumulatively over a 24-hour period) to an individual with a positive COVID-19 viral test result.]*

(c) Review of close contact tracing and COVID-19 investigation records will result in a testing hierarchy for workers.

(d) Isolation and Testing hierarchy risk tiers:
   i. **Tier 1** – includes workers who were identified as close contacts to a worker with a probable or confirmed COVID-19 diagnosis. Team members identified in Tier 1 will be asked to isolate at home for 14 days from the last known exposure date and monitor for symptoms; contact tracing (FORM-M0011H) and investigation (FORM-M0011I) will be required if symptoms develop or a positive test result (section 3.18.2b) is obtained during isolation to determine if the infection is work-related.

   *[**Example:** Team member C is identified by Team member A (section 3.18.1a) during contact tracing as a close contact (<6 ft for 15 minutes or more cumulatively over 24-hours); primary work location and schedule are irrelevant once identified as a close contact.]*

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ii. **Tier 2** – includes workers who were identified as close contacts to a worker with a probable or confirmed COVID-19 exposure. Team members identified in Tier 2 will be asked to isolate at home for 14 days from the last known exposure date and monitor for symptoms; contact tracing (FORM-M0011H) and investigation (FORM-M0011I) will be required if symptoms develop or a positive test result (section 3.18.2b) is obtained during isolation to determine if the infection is work-related.

*[**Example:** Team member D is identified by Team member B (section 3.18.1b) during contact tracing as a close contact (<6 ft for 15 minutes or more cumulatively over 24-hours); primary work location and schedule are irrelevant once identified as a close contact.]*

iii. **Tier 3** – includes workers who work the same shift, or an overlapping shift, in the same room with a worker with a probable or confirmed COVID-19 infection or exposure. Team members identified in Tier 3 will continue standard work as assigned, including following all pandemic safety measures as required.

*[**Example:** Team member A or B (sections 3.18.1a and 3.18.1b, respectively) do not identify individuals in Tier 3 as close contacts (<6 ft for 15 minutes or more cumulatively over 24-hours) although they work the same shift, or overlapping shift, in the same room.]*

iv. **Tier 4** – includes workers who work the same shift, or an overlapping shift, in a different room, and/or workers who shared a common space (e.g. a rest room, lunch room, hallway) and therefore some level of exposure to a worker with a probable or confirmed COVID-19 exposure or infection cannot be definitively ruled out. Team members identified in Tier 4 will continue standard work as assigned, including following all pandemic safety measures as required.

*[**Example:** Team member A or B (sections 3.18.1a and 3.18.1b, respectively) do not identify individuals in Tier 4 as close contacts (<6 ft for 15 minutes or more cumulatively over 24-hours) and they work the same shift, or overlapping shift, in a different room or may have shared a common space.]*

3.18.2 COVID-19 Testing Strategy

(a) **Team members who disclose a probable COVID-19 diagnosis** will be required to seek viral testing as soon as practical to confirm the presence of infection. The results of the test are to be provided to the HR Manager for record keeping purposes. In this case, a negative test result will continue to be treated as a positive diagnosis until such time as the certifying health care or public health official provides updated information to the team member. Written documentation is requested whenever possible to support the health care provider's or public health official's position.

*[**Note:** A probable COVID-19 diagnosis implies testing was not performed and the diagnosis is made based on circumstantial evidence provided by a health care provider or public health official. In this case testing will be required to determine if infection is present. If a negative test is obtained, the advising authority will need to certify if the team member is to continue isolation or return to work. Paragon will not authorize an early return to work without an updated health care provider or public health official attestation that early return to work is permitted.]*

(b) **Team members who disclose a probable or confirmed COVID-19 exposure event** (<6 ft for 15 minutes or more cumulatively over 24-hours) will be required to seek viral testing as soon as practical to determine a baseline test result. The results of the test are to be provided to the HR Manager for record keeping purposes. Additional testing will be required near the end of the 14-day isolation period (usually 10 to 12 days into isolation) to confirm an infection has not developed prior to discontinuing isolation and returning to work.

*[**Note:** Viral testing is required at disclosure of probable or confirmed COVID-19 exposure to rule out the possibility of an asymptomatic or pre-symptomatic infection and thereby reduce the exposure risk to other team members. Additional testing will be requested to ensure infection has not developed at a later point during the 14-day isolation (i.e. generally accepted virus incubation period). If at any point during isolation a positive test is obtained, or symptoms develop, contact tracing (FORM-M0011H) and investigation (FORM-M0011I) will be initiated. In this case, isolation and return to work strategy will be adjusted as described in section 3.18.1a and 3.20.2.]*

(c) **Team members who disclose a confirmed COVID-19 diagnosis** will not be required to seek viral testing prior to returning to work, except in certain circumstances as advised by the CDC. Refer to section 3.20.2 for additional information. Follow isolation requirements as described in section 3.18.1a.

*[**Note:** Viral testing is not required since a positive test result has already been provided and the CDC no longer recommends a test-based strategy to return to work except under certain circumstances.]*

(d) **Workers in Tier 1 and Tier 2** – will be required to seek viral testing as soon as practical to determine a baseline test result. The results of the test are to be provided to the HR Manager for record keeping purposes. Additional testing will be required near the end of the 14-day isolation period (usually 10 to 12 days into isolation) to confirm an infection has not developed prior to discontinuing isolation and returning to work.

*[**Note:** Viral testing is required when close contacts (<6 ft for 15 minutes or more cumulatively over 24-hours) are identified to rule out the possibility of an asymptomatic or pre-symptomatic infection and thereby reduce the exposure risk to other team members. Additional testing will be requested to ensure infection has not developed at a later point during the 14-day isolation (i.e. generally accepted virus incubation period). If at any point during isolation a positive test is obtained, or symptoms develop, contact tracing and investigation will be initiated. In this case, isolation and return to work strategy will be adjusted as described in section 3.18.1a and 3.20.2.]*

(e) **Workers in Tier 3 and Tier 4** – may elect voluntary testing if desired. If testing is elected, a copy of the test results are to be provided to the HR Manager for record keeping purposes.

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Recommendations for discontinuing isolation and returning to work in persons with **confirmed cases** of COVID-19 could, in some circumstances, appear to conflict with recommendations on when to discontinue quarantine for persons known to have been ***exposed*** to COVID-19. The CDC recommends 14 days of quarantine/isolation **following the date of the last exposure event** based on the time it takes to develop illness if infected. Thus, it is possible that a person *known* to be infected could leave isolation earlier than a person who is quarantined because of the *possibility* they are infected.

3.19 FAMILIES FIRST CORONAVIRUS RESPONSE ACT (FFCRA)

Team members may be eligible for additional benefits under the FFCRA, including Emergency Paid Sick Leave (EPSL) and Emergency Family and Medical Leave Expansion (EFMLA), for certain situations related to COVID-19. These provisions will apply from the effective date of April 1, 2020, through December 31, 2020.

Specific details pertaining to FFCRA benefits may be obtained by reviewing MAN-M0002AD and FORM-M0002Q on the management system or by reading the FFCRA Employee Rights Poster which is posted in a conspicuous location at each Paragon facility. For the benefit of all team members who are working off-site (telecommuting), the FFCRA Employee Rights Poster was also emailed to 'All Staff' on April 1, 2020. The poster may also be viewed directly by clicking on the blue link above.

For additional information on FFCRA benefits, please reach out to HR.

3.20 SELF-ISOLATION / QUARANTINE

Team members are requested to remain off company property for 14 days if they have:

- One (1) primary symptom OR two (2) secondary symptoms of COVID-19 (as detailed on FORM-M0011A)
- Been directly exposed to COVID-19
- Received a positive test result

3.20.1 General Self-Isolation / Quarantine Guidance

- Stay away from other people in your home as much as possible, staying in a separate room and using a separate bathroom, if available.
- Do not allow any visitors unless the person needs to be in your home.
- If you need medical attention, call ahead to ensure you're going to the right place and taking the necessary precautions.
- Wear a face mask if you must be around other people, such as during a drive to the doctor's office.
- When you cough/sneeze, cover your mouth and nose with a tissue, immediately throw tissues in the garbage, and wash your hands with soap and water for at least 20 seconds. If not available, clean with a hand sanitizer that has at least 60% alcohol.
- Avoid sharing household items, including drinking cups, eating utensils, towels, or even bedding. Wash these items thoroughly after use.
- Clean high-touch surfaces daily using a household cleaner or wipe. According to the CDC, these include counters, tabletops, doorknobs, bathroom fixtures, toilets, phones, keyboards, tablets, and bedside tables.
- Clean surfaces that may be contaminated with blood, stool, or bodily fluids.
- Use an air conditioner or open window to provide adequate airflow in shared spaces.
- Continue monitoring for any symptoms. If they worsen, such as breathing difficulty, call your health care provider or 911.
- Arrange to have groceries and toiletries delivered by local or state health departments. Also, inform health care providers of any medications you'll need so that they can arrange drop-offs of prescriptions.
- If you do not have laundry machines at home, ask health care providers to help with these services.

3.20.2 Returning to Work After Home Isolation / Quarantine

You must contact HR prior to returning to work to confirm you have met the necessary criteria for your return and to discuss documentation that may be required before you return to the company premises.

In accordance with CDC guidance, a test-based strategy is no longer recommended to determine when to discontinue home isolation following a positive COVID-19 diagnosis or a declaration of probable COVID-19 infection from a health care provider or public health official, except in certain circumstances*.

**The CDC recommends using a test-based strategy for return to work consideration for persons who are severely immunocompromised, in consultation with infectious disease experts.*

Symptom based criteria will now be used by Paragon, as recommended by the CDC, unless a team member's health care provider determines an alternate return to work plan is advisable. In this case, team members are asked to provide written certification from the advising health care professional detailing the return to work plan whenever possible.

Team members who have been under home isolation/quarantine can return to work under the following conditions, consistent with WHO/CDC guidelines:

If you **WILL NOT** be tested to determine if you are still contagious and;

i. You **did not** experience severe illness (i.e. were not hospitalized during your illness, or as determined by your health care provider) and;
ii. You **are not** severely immunocompromised (as determined by your health care provider):

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You have had no fever for at least 24 hours [One (1) full day of no fever, without the use of fever reducing medicine]
-AND-
Other symptoms have improved (for example, when your cough or shortness of breath have improved)
-AND-
Symptomatic Case - At least ten (10) days have passed since your symptoms first appeared
-OR-
Asymptomatic Case - At least ten (10) days have passed since the date of specimen collection resulting in your first positive viral COVID-19 test result

OR

If you **WILL NOT** be tested to determine if you are still contagious and;
i. You **did** experience severe illness (i.e. were hospitalized during your illness, or as determined by your health care provider) and;
ii. You **are** severely immunocompromised (as determined by your health care provider):

You have had no fever for at least 24 hours [One (1) full day of no fever, without the use of fever reducing medicine]
-AND-
Other symptoms have improved (for example, when your cough or shortness of breath have improved)
-AND-
Symptomatic Case - As determined by your health care provider, between ten (10) and twenty (20) days have passed since your symptoms first appeared
-OR-
Asymptomatic Case - As determined by your health care provider, between ten (10) and twenty (20) days have passed since your symptoms first appeared

OR

If you **WILL** be tested to determine if you are still contagious:

You have received two negative viral test results* for detection of SARS-CoV-2 RNA in a row from respiratory specimens collected at least 24 hours apart. Your doctor will follow local health authorities or CDC guidelines.
**Test results should be final before isolation is ended.*

Team members returning to work who have NOT been tested to determine if they are still contagious for COVID-19 must self-certify that they meet the conditions listed above by signing FORM-M0011D (COVID-19 Team Member Self-Certification to Return to Work) prior to being allowed to return to on-site work.

Recommendations for discontinuing isolation and returning to work in persons with **confirmed cases** of COVID-19 could, in some circumstances, appear to conflict with recommendations on when to discontinue quarantine for persons known to have been ***exposed*** to COVID-19. The CDC recommends 14 days of quarantine **following the date of the last exposure event** based on the time it takes to develop illness if infected. Thus, it is possible that a person *known* to be infected could leave isolation earlier than a person who is quarantined because of the *possibility* they are infected.

3.21 TEMPORARY AMENDMENTS TO FLOATING HOLIDAY, VACATION TIME OFF, AND PERSONAL TIME OFF POLICIES

Paragon acknowledges that due to the constantly evolving nature of the COVID-19 pandemic, flexibility of traditional paid time off policies (Floating Holiday (FH), Vacation Time Off (VTO), and Personal Time Off (PTO)) will benefit both the team member and the employer. As such, Paragon is making adjustments to the manner in which FH, VTO, and PTO may be utilized.

These amendments supplement the policies established in MAN-M0002, are retroactive to March 11, 2020, and are in place until further notice during the pandemic period:

- FH may be used in 1-hour increments
- Team members must consume FH, VTO, and PTO prior to requesting to take a full day off unpaid
- Team members may use a reduced number of hours for whole day absences
  i. During the period in which Paragon is able to utilize its Payroll Protection Program (PPP) funds for compensation related costs under loan forgiveness provisions, team members are to request/use at least 6-hours paid time off (FH, VTO, PTO) for full-day absences.
  ii. Following the PPP forgiveness eligibility period, team members may reduce the number of paid time off (FH, VTO, PTO) hours requested/used by two (2) hours per day as based on work schedules. For example, if a team member is scheduled to work 6-hours per day, then they must request at least 4-hours of paid time off for a full-day absence.

3.22 TEMPORARY TELECOMMUTING POLICY

In the event of an emergency such as a weather disaster or pandemic, Paragon Laboratories, Inc. may allow or require team members to temporarily work from home to ensure business continuity.

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In the event of an emergency, Paragon Laboratories, Inc. may require specific team members to work remotely. These team members will be advised of such requirements by their supervisor. Preparations should be made by team members and supervisors well in advance to allow remote work in emergency circumstances. This includes appropriate equipment needs, such as hardware, software, and phone access. The IT Manager is available to review equipment needs with team members and to provide support to team members in advance of or during emergency telework situations.

For voluntary telework arrangements, either the team member or supervisor can initiate a temporary telecommuting agreement during emergency circumstances. The team member and supervisor will discuss the job responsibilities and determine if the job is appropriate for a telecommuting arrangement, including equipment needs, workspace design considerations, and scheduling issues.

A Short-Term Telecommuting Agreement will be prepared by HR and signed by the team member and their supervisor. This telecommuting agreement establishes the company's expectations of team members while teleworking. Refer to FORM-M0011E for more information. Eligible team members must read and sign, FORM-M0011E, before being approved to work off-site. However, Paragon understands that emergency circumstances may not always allow for formal sign off and approval prior to initiating telework. In this case, it is expected that FORM-M0011E be reviewed and completed as soon as practical.

The team member will create an appropriate work environment within their home for work purposes. Paragon will not be responsible for costs associated with the setup of the team member's home office, such as remodeling, furniture or lighting, nor for repairs or modifications to the home office space.

Paragon will determine the equipment needs for each team member on a case-by-case basis. Equipment supplied by the organization is to be used for business purposes only. Refer to FORM-M0002P, Acceptable Use of Information System Policy Agreement form for more information.

Consistent with the organization's expectations of information security for team members working at the office, telecommuting team members will be expected to ensure the protection of proprietary company and client information accessible from their home office.

Team members should not assume any specified period of time for emergency telework arrangements, and Paragon may require team members to return to regular, in-office work at any time.

4.0 TEAM MEMBER TRAINING

As required by *Department of Labor and Economic Opportunity COVID-19 Workplace Safety Guidance* all team members will participate in training which covers: (1) Workplace infection-control practices; (2) The proper use of PPE; (3) Steps the team member must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19; and (4) How to report unsafe working conditions. Training sessions will be conducted primarily by virtual means; however, small in-person sessions may be used, provided strict adherence to all distancing and PPE requirements are met.

All team members are required to "Read and Acknowledge" this manual using the company intranet prior to participating in a training session. Following training team members will sign FORM-M0011G (Team Member Pandemic Response and Action Plan Training Acknowledgement) certifying (1) training was completed, (2) I understand my responsibilities and Paragon's expectations pertaining to the pandemic and related policies, (3) each team member had an opportunity to ask clarifying questions regarding this manual, MAN-M0011, and (4) that failure to follow the policies and procedures included in this manual will result in corrective action, up to and including, separation of employment.

The training sides will be made available to all team members and may be viewed or downloaded from the company intranet, REF-M0011B (Pandemic Response and Action Plan Training). Please contact HR or the EHS Coordinator for additional information.

Training Agenda:

- Our COVID-19 Response
- Signs & Symptoms of COVID-19
- Daily Self-Screening for Symptoms
- Isolation Protocol for Symptomatic Team Members
- Social Distancing Measures
- Personal Hygiene
- Disinfection Measures
- Personal Protective Equipment (PPE)

5.0 UNSAFE WORKING CONDITIONS

Team member safety is fundamental to the success of our organization. For the safety and well-being of all, team members are encouraged to be observant of their surroundings and to evaluate the efficacy of Paragon's safety policies often, including the policies in this manual. If unsafe working conditions are suspected, observed, or encountered, team members are asked to contact the EHS Coordinator as soon as possible so that a review of the conditions and risk assessment may be conducted.

The EHS Coordinator is charged with the responsibility of working with Paragon Leadership and the team members to resolve unsafe working conditions expeditiously in accordance with OSHA/MIOSHA regulations.

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Paragon prohibits retaliation against team members who provide information about, complain about, assist in the investigation, or assist in the resolution of unsafe working conditions.

Team members with questions regarding workplace safety and health may contact MIOSHA by calling 855-SAFE-C19 (855-723-3219). To report health and safety concerns in the workplace go to Michigan.gov/MIOSHAcomplaint.

6.0 ADDITIONAL RESOURCES

Paragon Laboratories Inc. understands that the COVID-19 pandemic has increased stress levels of workers across the country. We want to prioritize our team members' mental health during these uncertain times. As such, we have made every effort to ensure that the workplace is safe for all team members to return to work and are ready to discuss any personal situations that may occur. Supervisors are aware of mental health considerations during this transition. Team members with concerns regarding their mental health should request additional resources from their supervisor or HR.

- Employee Assistance Program – *BalanceWorks*
  - www.eniweb.com – User name: PAS220, Password: First Name & Last Name
  - Or call 1-800-960-5371 for assistance
- Michigan COVID-19 Mental Health Resources
- Substance Abuse and Mental Health Services Administration

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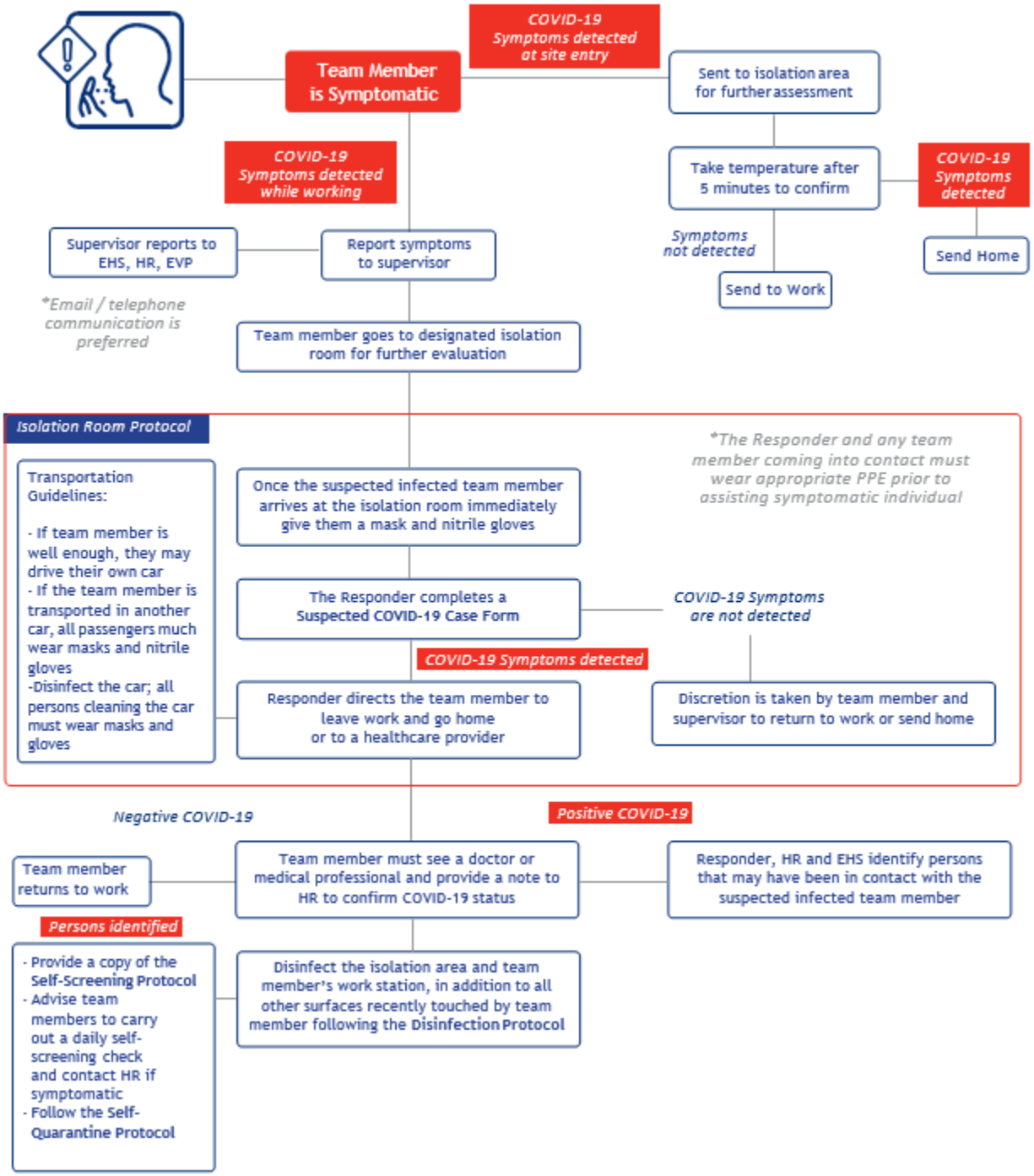
Attachment 1
Procedural Flowchart for
Team Member Symptom and Isolation Protocol



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Attachment 2
Procedure for
Team Member Daily Self-Screening Assessment
(REF-M0011A)

Paragon Laboratories, Inc. is concerned about your safety and the safety of your co-workers. We are closely monitoring the development of COVID-19. In the interest of ensuring a safe and healthy work environment, we ask that you voluntarily monitor your health status by carefully completing this self-assessment each day **before** coming to work.

Please ask yourself the survey questions below each day before coming to work:

1. Have you had physical exposure to a person suffering from COVID-19 symptoms, as noted in question 2 below?

   If you answered **YES**, **please contact Human Resources prior to coming to work** so that a determination can be made whether you should remain off-site from the company's facilities for 14 days following the last potential exposure to COVID-19. You may be required to submit evidence of exposure to an infected person. Should you be required to remain off-site, please keep in contact with an HR representative and receive clearance from HR before returning to the company's premises. You may also be required to have written authorization from a health care provider or public health official.

2. Do **ONE** or more of the following health conditions below currently apply to you?
   - **Fever**, measured temperature **>100.4 °F** or higher, or feeling feverish (i.e. subjective fever)
   - Uncontrolled **cough**
   - Atypical new onset of **shortness of breath** or difficulty breathing

   OR

   - At least **two (2)** of the following symptoms (not explained by a known physical condition): Loss of taste or smell, muscle aches, sore throat, severe headache, diarrhea, vomiting, or abdominal pain

   If the answer to question 2 is **YES**, you may have symptoms of COVID-19. We ask you to **please contact the Human Resources Manager**, seek medical attention, and remain off the company's property for 14 days, **OR** until able to provide a negative COVID-19 test result, and written medical clearance by a health care provider or public health official to return to work, with or without restrictions.

   If the answer to both of the above questions is NO:

   Please adhere to HR guidance regarding your work schedule and any special precautions to be taken.

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Attachment 3
Summary of On-Site Work Assignments
Feasibility and 'Strict Requirement' Assessment

Assignment	Department	Location	Roles	On-Site Frequency	Feasibility and 'Strict Requirement' Assessment
On-Site	Laboratory	Livonia 1	VP of Laboratory Operations	Daily	Must be on-site: Assigned as Site Manager for Livonia 1 & 2, assigned as PIC at Livonia 1; provide leadership, technical support, & analytical support to laboratory personnel
			Petroleum Team Leader Environmental Team Leader Biology Team Leader		Must be on-site: Assigned as PIC backup; provide leadership, technical support, & analytical support to laboratory personnel; analytical equipment is located on-site at facility
			Senior Chemist, Technical Leader Senior Chemist Chemist II Biologist II Chemist I Biologist I Laboratory Technician I		Must be on-site: Perform sample testing/ analysis daily for customers in the Energy, Water, & Wastewater critical infrastructure markets; analytical equipment is located on-site at facility
	Customer Service		Receiving / Sample Porter		Must be on-site: Receive, unpack, sort, label & transfer customer samples to the laboratory for analysis; provide support to on-site AC
			Warehouse / Shipping Handler		Must be on-site: Unpack vendor shipments, create bottle orders, prepare orders for shipment, & ship orders to customers; provide support to on-site AC
	Field Services		Field Service Technician Driver		Report to Livonia 1 Daily: Obtain supplies & equipment needed for field testing, sample collection, preservation/ transport, & equipment maintenance; return to facility with field samples at end of day
Hybrid	Administration		HR Manager	1 - 2 Days On-Site per week	Reduced on-site time: Assigned as PIC backup; provide HR support to on-site teams; enforce & provide training on COVID policies; provide support to EHS
			EHS Coordinator		Reduced on-site time: Assigned as PIC backup; provide EHS support to on-site teams; enforce & provide training on EHS & COVID policies; provide support to HR
	Customer Service		Senior Account Coordinator (AC) Account Coordinator (AC)	3-wk Rotation 1 AC On-site Daily	On-Site staffing level reduced by 2/3 per week: 1 AC must report to on-site work to focus solely on sample login for clients in the Energy, Water, & Wastewater critical infrastructure markets; 2 remote ACs will focus solely on reporting, invoicing, and coordinating with customers via phone/ email
Remote	Administration		Executive VP of Administration	Dictated by business need	Feasible to perform work remotely
	Quality		Vice President of Quality QA Coordinator LIMS Administrator		
	IT		IT Manager		
On-Site	Laboratory	Livonia 2	Senior Chemist Chemist I	Daily	Must be on-site: Assigned as PICs; perform sample testing/ analysis daily for customers in the Energy, Water, & Wastewater critical infrastructure segments; analytical equipment is located on-site at facility
Hybrid			PFAS Laboratory Team Leader	1 - 2 Days On-Site per week	Reduced on-site time: Assigned as PIC backup; provide leadership, technical support, & analytical support to laboratory personnel; analytical equipment is located on-site at facility
On-Site	Executive	Southfield	President	Daily	Must be on-site: Assigned as Site Manager & PIC for Southfield; provide leadership support to Paragon personnel at all locations
Hybrid	Administration		Controller	1 - 2 Days On-Site per week	Reduced on-site time: Assigned as PIC backup; receive & sort mail, receive monies, process vendor payments, issue & mail checks, process & file financial records
			Accounting Clerk		Reduced on-site time: support Controller with data entry, filing, receiving monies, & issuing payments
	Customer Service		VP of Customer Service		Reduced on-site time: Provide leadership, technical support, & service support to customer service personnel
Remote	Administration		Buyer	Dictated by business need	Feasible to perform work remotely
	Customer Service		Business Development Mgr - Env AC Team Leader Sales		
	Field Services		Field Service Team Leader		
	Executive		Executive Assistant		

**This table provides a high-level summary and guide for determining on-site work assignments by department, location, and role. Paragon reserves the right to adjust on-site assignments as necessary to address business need, pandemic stage, and guidance from health authorities, the federal, state, and local government.*

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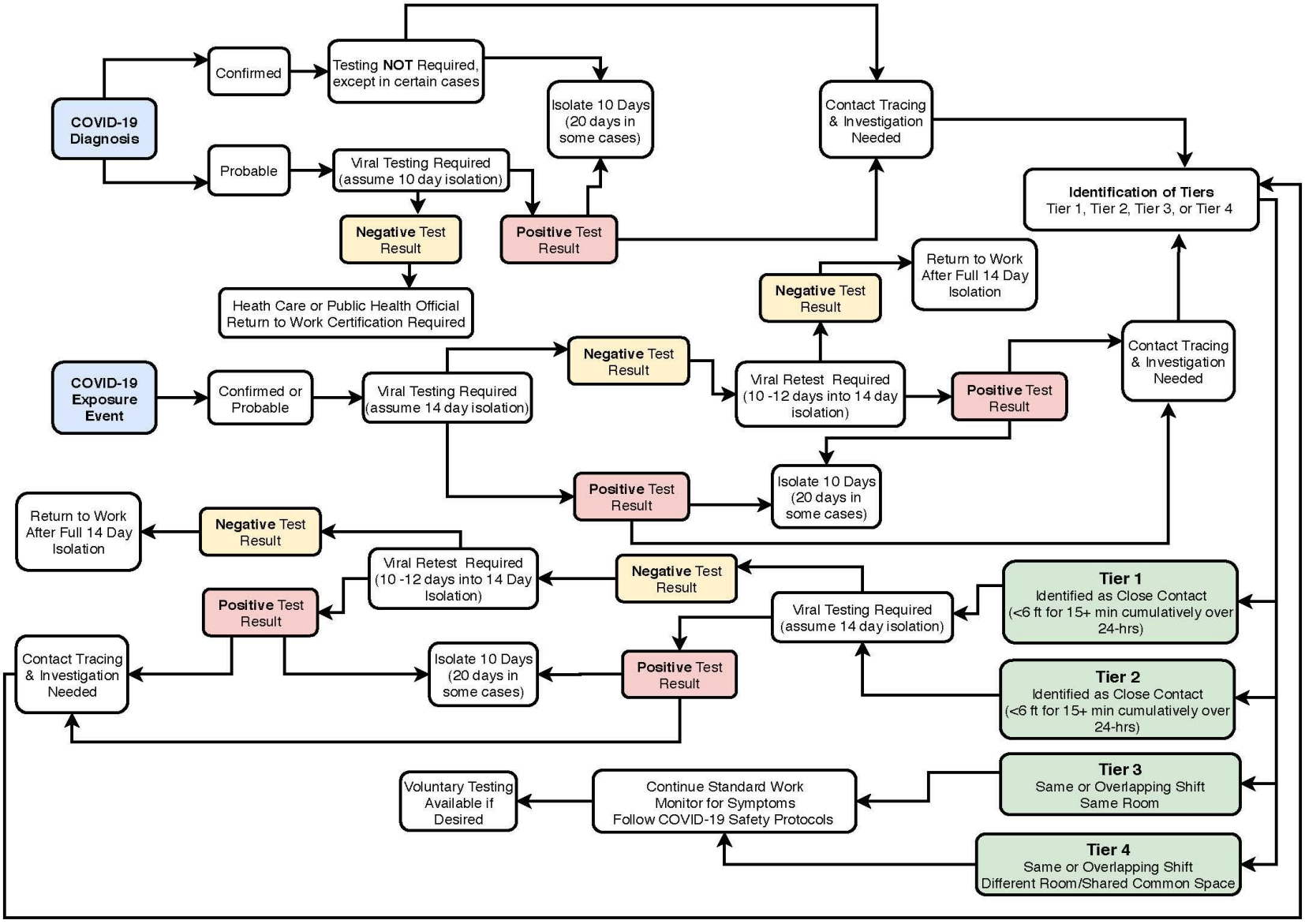
Attachment 4
Procedural Flowchart for
Team Member Isolation and Testing Strategy



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