

COVID-19 Preparedness and Response Plan

RBC Enterprises, Inc.
Detroit Steel Processing
Detroit Tubing Mill

QP100
Version 1.3
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1. Purpose

RBC Enterprises, Inc (RBC), the holding corporation of Detroit Steel Processing (DSP) and Detroit Tubing Mill (DTM), has established this COVID-19 Preparedness and Response Plan to outline its procedures for creating safe working conditions for its employees, business partners, and third parties. This is a working document and will be updated to reflect changes in expert recommendations and regulatory guidance. Updates are noted in 7.1 Revision History.

2. Scope

The procedures and recommendations within this document apply to DSP and DTM.

DSP provides steel storage, processing, and testing services to customers throughout the United States and Canada. DSP operates in the following location:

12301 Hubbell St
Detroit, MI 48227

DTM is a metal fabricator and distributor of low carbon, electric welded steel tubing and manufactures tubing in accordance with the ASTM A500, A513, and A787 specifications. The company serves customers throughout the United States and Canada and operates in the following locations:

12805 Eaton St
Detroit, MI 48227

12301 Hubbell St
Detroit, MI 48227

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3. General Procedures

3.1. Risk Categories

According to MIOSHA guidelines, all tasks and procedures conducted by RBC Enterprises qualify as “lower exposure risk.”

3.2. Worksite Supervisors

Worksite supervisors have been designated to implement, monitor, and report on the procedures outlined herein. At least one supervisor has been designated per shift, per location, including a separate supervisor for office staff at 12301 Hubbell St. The supervisor must remain on-site at all times when employees are present on site.

3.3. Employee Training

Employees have been trained in the following:

- Workplace infection-control practices
- Proper use of personal protective equipment (PPE)
- Necessary steps employee must take to notify the business of any symptoms of COVID-19 or suspected or confirmed diagnosis of COVID-19
- How to report unsafe working conditions
- Routes by which the virus causing COVID-19 is transmitted from person to person
- Distance the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces

Employees have received verbal and written communication on these topics. Records of our employee training are maintained by our HR department. This information is also posted for employees on our company website. The information is updated and communicated as necessary.

3.4. Daily Screening Protocol

Daily screening is required for all on-site employees and contractors. Each day, employees, contractors, and third-party drivers must answer a series of questions related to symptoms and suspected or confirmed exposure to people with COVID-19. In addition to the procedures outlined below, the screening questions and directions for contractors and third-party individuals are posted at all building entrances. Temperature readings are taken with a non-contact thermometer of each on-site individual (third-party drivers remaining in their vehicles are exempt from the temperature check). Individuals with temperatures of 100°F or greater will be handled in accordance with the protocols outlined in section 4.1 Symptomatic Employees. Follow-up on absent individuals will be made to ensure that the employee did not bypass screening or that the absence is not COVID-related.

3.4.1. Hubbell Street—Floor Personnel

Employees must enter through the northeast or southeast main doors and proceed directly to the production office window for a temperature check and to answer screening questions prior to proceeding further into the facility.

3.4.2. Hubbell Street—Office Personnel

Employees must enter through either office door and proceed directly to the office worksite supervisor for a temperature check and to answer screening questions prior to proceeding into the office area.

3.4.3. Hubbell Street—Contractors, Customers, and Third-Party Drivers

Contractors and customers must call the main DSP phone number prior to entering the facility. Once approved for entry, individuals are directed to check in at the production office window for a temperature check and to answer screening questions prior to proceeding further into the facility. Masks are required for contractors and customers while on the shop floor. Although it is strongly discouraged, customers may view the processing of their material provided they abide by this protocol.

Third-party drivers must call the main DSP phone number prior to entering the facility. Drivers are asked the screening questions over the phone. Once approved, drivers are directed to do the following:

- If the driver will be remaining in his or her vehicle, no further action is required
- Masks are required for drivers away from their vehicles
- Drivers seeking to use our restroom facilities must check in at the production office window for a temperature check and approval prior to restroom use

3.4.4. Eaton Street—Floor and Office Personnel

Employees must enter through the west man door and proceed to the time clock for a temperature check and to answer screening questions prior to proceeding further into the facility.

3.4.5. Eaton Street—Contractors and Third-Party Drivers

Contractors must call the main DTM phone number prior to entering the facility. Once approved for entry, individuals will be met at the west man door for a temperature check and to answer screening questions prior to proceeding further into the facility. Masks are required for contractors while on the shop floor.

Third-party drivers must call the main DTM phone number prior to entering the facility. Drivers are asked the screening questions over the phone. Once approved, drivers are directed to do the following:

- If the driver will be remaining in his or her vehicle, no further action is required
- Masks are required for drivers away from their vehicles
- Drivers seeking to use our restroom facilities must check in at the front office for a temperature check and approval prior to restroom use

3.5. Facility Deliveries

Masks are required for delivery personnel and personal contact is kept to a minimum while inside our facilities. Under no circumstances is anyone allowed in our facilities without passing the screening questions, but individual protocols may be arranged to streamline

regular deliveries and to limit personal contact, e.g., UPS drivers self-screen based on the posted screening questions, wear a mask while in our facility, and leave all deliveries in a particular location.

3.6. Facility Visits

All non-essential in-person visits to our facilities, including tours, are suspended.

3.7. Physical Distancing

Employees are urged to maintain a distance of at least six feet from one another to the maximum extent possible.

3.7.1. Production Floor

The layout of our facilities and the nature of our processes rarely require employees to be in close proximity to one another. Signs are posted in common areas to remind employees to maintain their distance. In situations where six feet of distance cannot be maintained, employees are required to wear face coverings. Floor marking have been placed near time clocks to indicate appropriate distancing. The number of chairs in the lunchrooms have been reduced and tables have been staggered to promote distancing.

3.7.2. Office

The workspaces within our office space are sufficiently staggered to maintain safe distances between employees. Social gatherings and meetings that do not allow for social distancing or that create unnecessary movement throughout the office are prohibited.

3.8. Tool Sharing

Employees have been reminded to clean their tools and workspaces and to limit the sharing of tools whenever possible. See 3.12.3 Cleaning Supplies and Personal Hygiene.

3.9. Face Coverings

The company provides non-medical grade face coverings to all employees.

3.9.1. Floor Personnel

Employees are required to wear face coverings when they cannot maintain at least six feet of distance from others, when in the office or common areas, or where required by the policy noted in section 4.2 Potential Exposure at Work or Home.

3.9.2. Office Personnel

Employees are required to wear face coverings whenever they are away from their own desk, during any face-to-face interactions, and where required by the policy noted in section 4.2 Potential Exposure at Work or Home.

3.9.3. Everyone Else—Non-RBC Personnel

All non-RBC personnel, e.g., customers, contractors, delivery workers, must wear masks at all times while in any RBC facility.

3.10. Travel

Business-related travel is restricted to essential travel only.

3.11. Remote Work

Given the nature of our processes, remote work is feasible for few employees. Remote work has been promoted to the fullest extent possible.

3.12. Cleaning Protocols

3.12.1. Standard Cleaning

The company has increased facility cleaning and disinfection to limit exposure to COVID-19. Particular attention is paid to cleaning common areas and high-touch surfaces, such as door knobs.

3.12.2. Confirmed or Suspected COVID-19 Cleaning

In the event of a confirmed or suspected COVID-19 case in the workplace, the company traces the path of the sick employee and then shuts down and thoroughly cleans and disinfects the areas within that path. See 4.1.3 Immediate Workplace Actions.

3.12.3. Cleaning Supplies and Personal Hygiene

Janitorial personnel have been reminded to closely monitor and replace the continuous cloth hand towels. No hand dryers are installed in our facilities. All drinking fountains have been disabled. In addition to the cleaning performed by the janitorial staff, all employees are provided with disinfectant for their individual workspaces. Soap and hand sanitizer are available. Time is provided to employees for frequent hand washing or use of hand sanitizer. Signs pertaining to the importance of personal hygiene are posted throughout our facilities.

3.13. Shift Schedules and Staffing

When possible, we've reduced the number of employees in our facilities at a given time via streamlined staffing and/or additional shifts. With ample space in our breakrooms, staggered meal and break times are not currently needed.

4. Managing Symptomatic and Exposed Employees

Section 4 outlines directions for RBC management personnel:

RBC is adapting the *CDC symptom-based COVID-19 management strategy* (for the time being, until/unless conditions related to testing availability and convenience improve). The company is following the guidelines from Wayne County Public Health Department except when they are in conflict with the CDC guidelines, in which case the more current CDC recommendations are used.

4.1. Symptomatic Employees

4.1.1. Level 1 Symptoms

If an employee calls in with, is found to have at screening before shift, or develops during a shift these symptoms:

- Fever $\geq 100^{\circ}\text{F}$
- Cough
- Shortness of breath
- Chills
- New onset loss of smell/taste

Please instruct the employee to:

- Stay home or go home immediately
- Contact medical provider for instructions
- Seek out a test for Covid-19
- Remain self-isolated at home until criteria for return-to-work are met (see below)

4.1.2. Level 2 Symptoms

If an employee calls in with or develops during a shift these symptoms:

- Muscle pain
- Nausea, vomiting, or diarrhea
- Headache
- Sore throat

Please instruct employee to:

- Stay home or go home immediately
- Contact their medical provider
- Wait for follow-up communication from RBC

Please contact company RN and share employee name and contact information. The RN will contact the employee directly within 24 hours to evaluate symptoms and make a recommendation about whether the employee can return to work OR instead needs to self-isolate and seek out testing. In most cases it will probably be 8 hours or fewer until an employee is contacted. *Guidance from an employee's medical provider will always supersede RN recommendation if there is a discrepancy.*

4.1.3. Immediate Workplace Actions

If an employee becomes sick during the workday, surfaces within their workspace need to be promptly cleaned and disinfected. Other individuals in the facility who have come in close contact (within 6 feet) of symptomatic employee will be considered exposed and need to follow guidelines for potential exposure (see section below) if contact occurred:

- Since onset of employee symptoms

OR

- Within period of time 48 hours prior to onset of symptoms

4.1.4. Confirmed Case Actions

In the event of a confirmed case of COVID-19, the case must be reported within 24 hours to the Wayne County Public Health Division. Any co-workers, contractors, or suppliers who may have come into contact with the confirmed person must also be notified within 24 hours.

4.2. Potential Exposure at Work or Home

Potential exposure refers to *being a household contact* (sharing a living space) or *having close contact for a total of 15 minutes within 6 feet* of an individual with confirmed or suspected COVID-19 since symptom onset and 48 hours prior to symptom onset.

CDC advises that critical infrastructure workers *may be permitted to continue work* following potential exposure to COVID-19, *provided they remain asymptomatic* and additional precautions are implemented:

- **Pre-Screen:** Employer will measure the employee's temperature and assess symptoms prior to employee starting work for the day
- **Regular Monitoring:** As long as the employee doesn't have a temperature or symptoms, they will be instructed to self-monitor for changes in health status and report any changes or new symptoms to supervisor immediately
- **Wear a Mask:** The employee will wear a face mask at all times while in the workplace for 14 days after last exposure
- **Social Distance:** The employee will maintain 6 feet of physical distance from other employees at all times while in the workplace.

4.3. Ending Self-Isolation and Returning to Work

4.3.1. Symptomatic Employee with Confirmed or Suspected Infection

A symptomatic employee with a confirmed or suspected COVID-19 infection may return to work after self-isolating if:

- **10 days have passed since onset of symptoms** (regardless of number of days since test date and/or positive result)

AND

- Employee has been **fever-free for at least 24 hours** (1 day) **WITHOUT** antipyretic medications (Tylenol, Ibuprofen, aspirin, or other fever-reducers)

AND

- **Other symptoms** (cough, shortness of breath, chills, etc.) **have improved.**

4.3.2. Asymptomatic Employee with Positive Test

An employee who tested positive for COVID-19 but had no symptoms may return to work if:

- **10 days have passed since test**

AND

- Employee continues to be symptom free

4.3.3. Other Return-To-Work Considerations

Upon return, the face-covering requirements of section 3.9 apply.

Frequent handwashing and physical distancing of at least 6 feet will need to be observed at all times by all employees regardless of COVID-19 status.

At this time, **negative COVID-19 test(s) are not required** for an employee to return to work.

4.4. Non-Retaliation

Discharging, disciplining, or otherwise retaliating against employees who stay home or who leave work when they are at particular risk of infecting others with COVID-19 is prohibited.

5. Record Keeping

Records related to employee training, daily screenings, and confirmed cases of COVID-19 are maintained by our HR Department. Where applicable, employee medical records are kept and communicated in accordance with HIPAA regulations.

6. Communicating this Plan

The plan is communicated, understood, and applied throughout the organization. A current version of this policy is posted on the company website. Printed copies are available upon request and are available to interested parties.

7. Appendix

7.1. Revision History

Version	Date	Change Description
1.3	11/16/2020	Added: <ul style="list-style-type: none">• Section 3.9.3 Changed: <ul style="list-style-type: none">• Sections 3.9.1 and 3.9.2 to reflect tighter face covering requirements
1.2	11/02/2020	Added: <ul style="list-style-type: none">• Section 3.1 Changed: <ul style="list-style-type: none">• Definition of close contact from 15 continuous to 15 total minutes in Section 4.2. Deleted: <ul style="list-style-type: none">• Note regarding PPE on public transportation in Section 3.3.
1.1	7/28/2020	Added: <ul style="list-style-type: none">• 6-ft distance requirement to 3.9.2.• 15-minute requirement to 4.2.• Sections 4.3.1, 4.3.2, and 4.3.3. Changed: <ul style="list-style-type: none">• Editorial changes to 3.9.1, 3.9.2, 3.11 and 3.13.• Reduced fever-free requirement in 4.3.1 to from 72 to 24 hours.• Mask requirement for returning workers in 4.3.3.
1.0	06/01/2020	Creation of COVID-19 Preparedness and Response Plan