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Singh Homes Sales Office & Model Home

COVID-19 Exposure Prevention, Preparedness, and Response Plan

Updated: May 4, 2020

The purpose of this plan is to outline the steps that every employer and employee can take to reduce the risk of exposure to COVID-19. The plan describes how to prevent employee exposure to coronavirus, protective measures to be taken, personal protective equipment and work practice controls to be used, cleaning and disinfecting procedures, and what to do if an employee becomes sick.

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Singh Homes takes the health and safety of our employees very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, we all must remain vigilant in mitigating the outbreak. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented throughout Singh Homes and at all of our sales offices and model homes.

This Plan is based on currently available information from the CDC and OSHA and is subject to change based on further information provided by the CDC, OSHA, and other public officials. Singh Homes may also amend this Plan based on operational needs.

I. Responsibilities of Managers and Supervisors

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

II. Responsibilities of Employees

We are asking every one of our employees to help with our prevention efforts while at work. In order to minimize the spread of COVID-19 at our jobsites, we all must play our part. As set forth below, Singh Homes has instituted various housekeeping, social distancing, and other best practices at our jobsites. All employees must follow these. In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below.

OSHA and the CDC have provided the following control and preventative guidance to all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.

In addition, trade contractors and vendors must familiarize themselves with the symptoms of COVID-19:

- Coughing;
- Fever of 100.4 degrees Fahrenheit or higher;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, **DO NOT GO TO WORK** and call your healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your healthcare provider right away.

III. Protective Measures

Singh Homes has instituted the following protective measures at all sales offices, model homes, and immediate occupancy homes:

A. General Safety Policies and Rules

- Any employee/visitor showing symptoms of COVID-19 will be asked to leave the office and return home. Singh Homes may determine that taking employee/visitor temperatures at sales offices is appropriate and restrict access based upon temperature readings. As an alternative to taking temperatures at the worksite, Singh Homes may request employees to take their own temperatures prior to coming to the worksite. (See Appendix A for additional information.)
- Employees must avoid physical contact with others and direct employees/visitors to increase personal space to at least six (6) feet, where possible.
- All in-person meetings will be limited. To the extent possible, meetings will be conducted virtually. During any in-person meetings, avoid gathering in groups of more than 10 people and participants must remain at least six (6) feet apart.
- Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people.
- Employees are encouraged to limit the need for N95 respirator use, by using engineering and work practice controls to minimize dust. Such controls include the use of water delivery and dust collection systems, as well as limiting exposure time.

B. Visitors

- To manage group size and practice appropriate social distancing, access to model homes, sales offices, and immediate occupancy homes will be by appointment only and will be limited to no more than four people on the premises at any one time.
- All pertinent customer touch points will be cleaned between appointments.
- All visitors will be asked to sanitize their hands upon entering any model home, sales office, or immediate occupancy home. Singh Homes will provide hand sanitizer for this purpose. Singh Homes employees will disinfect the dispenser after each use.
- All visitors will be screened prior to entering the sales office or model home. If the visitor answers “yes” to any of the following questions, he/she should not be permitted to access.
 - Have you been confirmed positive for COVID-19?

- Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
- Have you been in close contact with any persons who have been confirmed positive for COVID-19 and are also exhibiting acute respiratory illness symptoms?
- Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
- Singh Homes may determine that taking visitor temperatures is appropriate and restricting access based upon temperature readings. (See Appendix A for more information.)
- Deliveries will be permitted but should be properly coordinated in line with the employer's minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if possible.

C. Personal Protective Equipment and Work Practice Controls

- Singh Homes will provide the following:
 - Gloves: Gloves should be worn at all times. Employees should avoid sharing gloves.
 - **NOTE:** The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Employees should wear N95 respirators if required by the work and if available.
 - Face coverings: face coverings should be worn at all times.

E. Face Coverings

A face covering is a cloth, bandana, or other type of material that covers a person's nose and mouth. The CDC lists five criteria for "cloth face coverings": the face covering should:

- fit snugly but comfortably against the side of the face;
- be secured with ties or ear loops;
- include multiple layers of fabric;
- allow for breathing without restriction; and
- be able to be laundered and machine-dried without damage or change to shape.

Use of a face covering is not a substitute for other workplace preventative techniques that are outlined in this Plan.

IV. Cleaning and Disinfecting

Singh Homes has instituted regular housekeeping practices, which includes cleaning and disinfecting frequent touch points, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas.

- Sales offices & model homes will be cleaned at least once per day. Immediate occupancy homes will be cleaned after each home tour. Employees performing cleaning will be issued proper personal protective equipment (“PPE”), such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC.
- Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Singh Homes will ensure that any disinfection shall be conducted using one of the following:
 - Common EPA-registered household disinfectant;
 - Alcohol solution with at least 60% alcohol; or
 - Diluted household bleach solutions (these can be used if appropriate for the surface).
- Singh Homes will maintain Safety Data Sheets of all disinfectants used on site.

V. Exposure Situations

A. Employee Exhibiting COVID-19 Symptoms

If an employee exhibits COVID-19 symptoms, the employee must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). Singh Homes will similarly require an employee that reports to work with symptoms to return home until they are symptom free for 72 hours (3 full days). To the extent practical, employees are required to obtain a doctor’s note clearing them to return to work.

B. Employee Tests Positive for COVID-19

An employee that tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and are symptom free may return to work when at least seven (7) days have passed since the date of his or her first positive test and have not had a subsequent illness. Employees that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;¹ and (2) at least seven (7) days have passed since symptoms first

¹ Recovery is defined as: (1) resolution of fever without the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. Singh Homes will require an employee to provide documentation clearing their return to work.

C. Employee Has Close Contact with a Tested Positive COVID-19 Individual

Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise), will be directed to either: (1) continue to work, provided they remain asymptomatic in accordance with Section III above; or, if they are symptomatic or Singh Homes chooses to follow more conservative protocols, (2) self-quarantine for 14 days from the last date of close contact with the carrier. Close contact is defined as six (6) feet for a prolonged period of time.

If Singh Homes learns that an employee has tested positive, Singh Homes will conduct an investigation into co-workers that may have had close contact with the confirmed-positive employee in the prior 14 days and direct those individuals that have had close contact with the confirmed-positive employee to either continue to work, provided they remain asymptomatic in accordance with Section III above, or, if they are symptomatic or Singh Homes chooses to follow more conservative protocols, to self-quarantine for 14 days from the last date of close contact with the carrier. If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact.

VI. OSHA Recordkeeping

For purposes of recording cases of COVID-19, Singh Homes is responsible for recording a case, if:

- The case is a tested-positive confirmed case of COVID-19, as defined by the CDC; and
- The case is “work-related,” which is defined as an event or exposure that either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness; and
- The case involves one or more of the following:
 - Death;
 - Days away from work;
 - Restricted work or transfer to another job;
 - Medical treatment beyond first aid;
 - Loss of consciousness; and

- A significant injury or illness diagnosed by a physician or other licensed health care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

However, per OSHA recent guidance, Singh Homes will consider a COVID-19 positive case to be work-related only where:

- There is objective evidence that a COVID-19 case may be work-related. For example, a number of cases developing among workers who work closely together without an alternative explanation; and
- The evidence was reasonably available to Singh Homes. For example, Singh Homes was given information by employees or Singh Homes learns of information regarding employees' health and safety in the ordinary course of business.

For purposes of reporting the case to OSHA, Singh Homes will report any work-related confirmed cases if they result in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

VII. Work Authorization

Several States and localities are issuing orders that prohibit work and travel, except for certain exempted businesses. If upon your travel to and from the worksite, you are stopped by State or local authorities, you will be provided a letter that you can show the authorities indicating that you are employed in an exempted industry and are commuting to and from work.

VIII. Confidentiality/Privacy

Except for circumstances in which Singh Homes is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed of an employee's condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the employee and to detect situations where the potential for transmission may increase. A sample notice to employees is attached to this Plan. Singh Homes reserves the right to inform other employees that a co-worker (without disclosing the person's name) has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health.

IX. General Questions

Given the fast-developing nature of the COVID-19 outbreak, Singh Homes may modify this Plan on a case-by-case basis. If you have any questions concerning this Plan, please contact Matt DeLapp.

Appendix A – Temperature Screening Guidance

General Considerations²

- Certain local jurisdictions have recommended or required employers to conduct temperature screenings of employees as they enter the worksite. Any applicable federal, state, or local requirements on employee temperature screenings should be consulted prior to performing them.
- Temperature screenings must be conducted consistently, professionally, and with proper training for those conducting the checks. Such checks must be uniformly and non-discriminatorily conducted on all employees (as well as contractors, vendors, customers, and/or visitors, if they will also be screened).
- Any information obtained from temperature screenings should be stored securely with access limited to those with a business need to know. It is essential to have proper documentation in the event that an individual needs to be excluded from the worksite based on the results of their temperature screening. If excluding individuals from a worksite based upon temperature, a set temperature should be established, based upon public health recommendations. Many employers have set the temperature required for exclusion at 100.4 degrees Fahrenheit or above.
- Wage protocols and procedures to account for any potential time spent waiting in line to be screened must also be considered. This is particularly important at worksites where there may be numerous workers reporting to their shift at the same time and only one or two individuals conducting the temperature screenings. Any existing Collective Bargaining Agreements should also be considered.

Options for Screening

- There are two options for how temperature screening can be conducted:
 - By the employee, at home, prior to leaving for work; or
 - By the employer, at the worksite, when the employee arrives to report for their shift.
- Types of temperature screeners:
 - *Traditional digital thermometers applied typically in the ear.* These thermometers should only be used with a temperature screening policy that requires employees to conduct such screenings at their homes, prior to leaving for their shift. These types of thermometers should not be used by employers at the worksite as there would be a high risk of exposure for the individuals conducting such temperature screenings.

² Temperature screening involves numerous, difficult legal issues. This Appendix does not represent a comprehensive discussion of all of those issues. It is intended to provide some basic guidance to contractors who might be performing screening. Contractors should consult with legal counsel before implementing a screening program.

- *Infrared thermometers.* Infrared thermometers are the most practicable and safe option for conducting screening at work. However, the individual conducting such temperature screening must still be provided with appropriate protective gear. If the infrared thermometer does not allow the individual conducting the screening to stand at least six feet from the employee being screened, the following protective gear is recommended:
 - The individual conducting the screening should wear a face covering and gloves. If at all possible, the employee being screened should wear a face covering as well during the check.
 - If the employee is not wearing a face covering, the individual conducting the screening should wear a gown and eye protection in addition to a face covering and gloves.

If the individual conducting the screening is able to stand six feet or more from the employee being screened, no additional protective gear is necessary, though a face mask and gloves are recommended.