



Health, Safety & Environmental (HSE) Manual

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0.056

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REVISION:

3.0

DATE:

03/17/2020

Subject: Pandemic Preparedness Policy

Purpose

Business continuity means ensuring that essential business functions can survive a natural disaster, technological failure, human error, or other disruption. Many existing business continuity plans anticipate disruptions such as fires, earthquakes, and floods. These events are restricted to certain geographic areas and the time frames are well defined and limited. Pandemic disease, however, demands a different set of continuity assumptions since it will be widely dispersed geographically and potentially arrives in waves that could last several months at a time.

Assignment of Ownership of the Pandemic Disease Plan

A pandemic disease plan or disease containment plan has been developed by TorcSill Foundations, LLC. The Manager of Safety/DOT will identify workplace coordinators who will be responsible for dealing with disease issues and their impact at the workplace. This may include contacting local health department and health care providers in advance and developing and implementing protocols for response to ill individuals.

Assumptions

A pandemic disease will spread rapidly and easily from person to person, affecting all businesses due to absenteeism. Businesses that are relied upon by other businesses will be facing the same massive absentee rates and will be unable to provide essential components to maintain the daily operations.

Risk assessments to identify the essential/critical components of our business operation need to be conducted.

Recognize that a pandemic includes:

- Healthcare services not being available (they are already full at present with the usual ailments).
- Schools, churches and other public places may not be open.
- Borders are partially or fully closed, especially airports, leaving people (our families, employees, business partners, customers and suppliers) “stranded”.
- Essential materials and supplies may be limited due to distribution chains that are affected by the travel restrictions or absentee workers supporting those transportation means.
- Essential services around utilities, food distribution/access and banking systems may not be at “normal levels”; access to cash flow could be tight.
- People may not be willing to or able to come to work.

Effective Internal/Employee Communication Procedure

Communications during a pandemic involves both internal communications and external communications. Internal communication will be provided to employees to educate them about pandemic diseases and measures they can take to be prepared.



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Key contacts, a chain of communications and contact numbers for employees, and processes for tracking business and employee's status should be developed.

Risk communication is critical to inform employees regarding changes in the pandemic status. The following is one method for providing such information.

Alert: conveys the highest level of importance; warrants immediate action or attention.

Advisory: provides key information for a specific incident or situation; might not require immediate action.

Update: provides updated information regarding an incident or situation; unlikely to require immediate action.

Provide continuous updates through internal & external communications when a pandemic is imminent:

- Notification to employees of operational changes
- Provide frequent updates about the pandemic status
- Provide advisories and alerts as conditions change
- Ensure vendors and suppliers have available a dedicated communications contact
- Monitor local, state, and federal pandemic updates

We will use our phone and email systems to communicate with employees. The use of the TorcSill Foundations, LLC website also will serve as a portal for sharing information with employees and vendors.

Effective External/Customer Communication Procedure

A procedure must be developed to notify key contacts including both customers and suppliers in the event an outbreak has impacted our ability to perform services. This procedure must also include notification to customers and suppliers when operations resume.

Business Continuity Planning

Business continuity plans should be prepared so that if a large or significant absenteeism of personnel become ill or changes in business practices are required business operations can be effectively maintained.

Maintaining two-shift operations allow TorcSill Foundations, LLC to keep the factory running if one shift is stopped due to infection.

Maintaining crew separation with Field Service allows TorcSill Foundations, LLC to dispatch a new crew to replace a crew that may become infected.



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COMMAND STAFF:

Incident Commander (President/CEO)	Organizes and directs all aspects of the incident response
Public Information Officer (Media/Public Relations)	Creates and releases upon approval from the incident commander all information to the staff, media and public.
Liaison Officer (Directors of Operations)	Establishes and maintains relationships with outside organizations
Safety Officer (Safety Manager)	Ensures the safety of all persons involved with the pandemic

OPERATIONS SECTION:

Operations Section Chief (Directors of Operations)	Initiates and manages ongoing operations throughout a pandemic
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LOGISTICS SECTION:

Logistics Section Chief (Purchasing/Inventory Manager)	Meets the goods, services, and staffing needs of the operation during the pandemic
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PLANNING SECTION:

Planning Section Chief (Safety/DOT Manager)	Collects information and resources potentially relevant to the pandemic and TorcSill Foundations, LLC operations
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FINANCE SECTION:

Finance Section Chief (CFO)	Monitors all expenditures and ensures fiscal resource availability during the pandemic
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Pandemic Response by Pandemic Phase

Currently the WHO has created various phases for a pandemic but does not always relate to events locally.

- **Phase 1** no viruses circulating among animals have been reported to cause infections in humans.
- **Phase 2** an animal influenza virus circulating among domesticated or wild animals is known to have caused infection in humans and is therefore considered a potential pandemic threat.
- **Phase 3**, an animal or human-animal influenza virus has caused sporadic cases or small clusters of disease in people but has not resulted in human-to-human transmission sufficient to sustain community-level outbreaks. Limited human-to-human transmission may occur under some circumstances, for example, when there is close contact between an infected person and an unprotected caregiver. However, limited transmission under such restricted circumstances does not indicate that the virus has gained the level of transmissibility among humans necessary to cause a pandemic.

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- **Phase 4** is characterized by verified human-to-human transmission of an animal or human-animal influenza virus able to cause “community-level outbreaks.” The ability to cause sustained disease outbreaks in a community marks a significant upwards shift in the risk for a pandemic. Any country that suspects or has verified such an event should urgently consult with WHO so that the situation can be jointly assessed, and a decision made by the affected country if implementation of a rapid pandemic containment operation is warranted. Phase 4 indicates a significant increase in risk of a pandemic but does not necessarily mean that a pandemic is a forgone conclusion.
- **Phase 5** is characterized by human-to-human spread of the virus into at least two countries in one WHO region. While most countries will not be affected at this stage, the declaration of Phase 5 is a strong signal that a pandemic is imminent and that the time to finalize the organization, communication, and implementation of the planned mitigation measures is short.
- **Phase 6**, the pandemic phase, is characterized by community level outbreaks in at least one other country in a different WHO region in addition to the criteria defined in Phase 5. Designation of this phase will indicate that a global pandemic is under way.

At Risk Employees

Any employee that has tested positive for the COVID-19 virus will be asked to identify all co-workers and worksite areas they may have been in contact with at least 14 days prior to when they tested positive. They will not be allowed on any TorcSill worksites or Client worksite until they have a negative test and can return to work safely.

Any employees that have been in contact with an employee that has tested positive will be notified (without disclosing the infected employees’ information). Any employee that comes into contact with any person that has tested positive should notify their Supervisor immediately. TorcSill will consult with established medical providers to construct a specific plan directed at protecting the employee and all potential co-workers.

Any employee traveling from a country listed on the Center for Disease Control and Prevention’s Level 3 Travel Health Notice should notify his Supervisor immediately. These employees will be asked to not return to work for a minimum of 14 days. These employees are also encouraged to self-quarantine for at least 14 days.

Work At Home or Stay At Home Policy

Flexible work policies should be developed as practical. Workers are encouraged to stay at home when ill, when having to care for ill family members, or when caring for children when schools close, without fear of reprisal. Tele-commuting or other work-at-home strategies are developed when possible.

Infection Control Measures

Guidelines for infection control are important to clarify the routes of transmission and the ways to interrupt transmission through measures of hygiene. Infection control is an essential component of pandemic management and a component of public health measures. Essential measures include:

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- Hand washing and use of hand sanitizers should be encouraged by TorcSill Foundations, LLC supervision. Hand washing facilities, hand sanitizers, tissues, no touch trash cans, hand soap and disposable towels will be provided by TorcSill Foundations, LLC.
- Equipment and/or working surfaces shall be cleaned periodically. Clean all areas that are likely to have frequent hand contact (like doorknobs, faucets, handrails) periodically and when visibly soiled. Work surfaces should also be cleaned frequently using normal cleaning products. Sanitizing program includes:
 - Daily sanitizing of facilities
 - Daily sanitizing of vehicles
 - Daily or Change of operator sanitizing of construction equipment
- Facility protection
 - All facilities locked with only scheduled and approved appointments allowed in.
 - All delivery drivers must stay in vehicle
- Factory protection
 - Factory staffed with two swing shifts, minimum two hours between shifts to avoid personal contact.
 - All doors and fans on in factory, promoting maximum fresh air flow
 - Elimination of “tight” team meetings, all team meetings to be held outside with proper spacing (6’) between all employees
 - Daily clean uniform check
- Field Service protection
 - No mixing of crews
 - No shared meals
 - Daily clean uniform check
- Workers are encouraged to obtain appropriate immunizations to help avoid disease. Granting time off work to obtain the vaccine will be considered when vaccines become available in the community.
- Limiting large or crowded gatherings of personnel if an outbreak or increased level of disease is in progress - Social distancing including increasing the space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings should be considered.

Additional examples of infection control measures include:

- No group meals
- No handshake policy
- Travel – if required must be approved by CEO
- All essential employees, HQ, Factory and Field service to have a personal temperature check performed before start of workday. Employees with temperatures equal to or greater than 100 degrees are sent home.

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- Stay at home when you are sick. If possible, stay away from work, school and from running errands. You will help others from catching your illness.
- Cover your coughs and sneeze into tissue, or cough into your shirt sleeve.
- Enhance existing housekeeping service by wiping down and disinfecting work areas (i.e. keyboards, telephones, desks, etc.) frequently.
- Enhance housekeeping services for general public use areas several times throughout the work period.
- Use personal protective equipment where appropriate to minimize exposure (i.e. gloves- for handling money, masks- for ill employees)

Implementation, Testing, and Revision of the Plan

The Pandemic Plan is reviewed and/or tested. The plan and emergency communication strategies should be periodically tested to ensure it is effective and workable.

Testing the plan will be accomplished by conducting exercises. Exercises range from low stress to full scale, hands on drills. A tabletop exercise is the easiest way to begin testing the plan. This type of exercise involves having discussions regarding a scenario that challenges the plan and the decision makers during an emergency. Functional exercises take on an additional level of complexity, in that they require participants to conduct functional components of the plan. This usually involves planning specific scenarios, creating pretend data and present issues that target an area within the plan to be tested.

Each of these methods of testing the plan requires extensive planning for the exercise and the evaluation. The evaluation is critical to revising the plan, by capturing actual responses during the exercise or drill objectively. Once this data is captured, an after-action report with recommendations to revising the plan should be completed within a few weeks of the exercise.

Process for Implementing Lessons Learned Following a Pandemic Event

Following a pandemic event, the person responsible for implementation of the plan will identify learning opportunities and take action to implement any corrective actions.

Training

Employees will be trained on health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread of the disease, and when it is appropriate to return to work after illness. Disease containment plans and expectations should be shared with employees.

Documentation of all training is required.