



## IMCO Interim COVID-19 Policy

Updated 07/31/2020: Effective immediately

As an employer, IMCO has a responsibility to protect employee safety and health. This policy has and will continue to be updated as we learn more about COVID-19 and threats to our employees and community. The intent of this policy is to help provide a safe work environment, to prevent the spread of the virus, and to ensure IMCO's security during this turbulent time.

Every staff member has a responsibility to take action to prevent the spread of COVID-19. All employees are required to abide by this policy.

### Prevent Spread:

Employees can substantially reduce the risk of spreading the virus by recognizing symptoms and self-isolating. The CDC identifies symptoms of COVID-19 as one or more of the following starting 2-14 days after exposure to the virus:

- Fever or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

### Employees experiencing any of these symptoms must stay home!

Employees who enter an IMCO office or arrive at a jobsite with COVID-19 symptoms will be immediately sent home. If you have symptoms consistent with COVID-19, stay home and notify your supervisor and the IMCO HR Department. Communication is critical to help keep our team and our communities safe.

Employees who suspect they have been exposed to COVID-19 must notify their supervisor prior to coming to a jobsite or office. Such incidences will be evaluated on a case-by-case basis, and IMCO will work with the employee to determine an appropriate course of action to return the employee to work.

**COVID-19 Testing:** IMCO has an agreement with Atlas Genomics to provide testing to our employees. Employees who have symptoms, or have been exposed to someone who has symptoms or who has tested positive for COVID-19, should contact human resources or the Director of Safety to identify the need for and organize testing.

### Returning to Work:

Employees who had COVID-19 symptoms or were diagnosed with the virus may return to work after one of the following scenarios is met:

- COVID-19 symptoms have been gone for 72 hours without the aid of medicine.
- A COVID-19 test result confirms you do not or no longer have an active COVID-19 virus.



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### Employees who suspected they had been exposed to COVID-19:

- If the person the employee was in close contact with tests positive, the employee must notify their supervisor and our Director of HR. Clearance to return to work must be received from a medical professional before employees can return to work following close contact with a person who tested positive for COVID-19.
- Employees may return to work if the person they had had contact with tests negative.

It is the intent of this policy to follow CDC recommendations. CDC recommendations for returning to work: <https://www.cdc.gov/coronavirus/2019-ncov/community/worker-safety-support/index.html>

**Working from home.** In order to minimize the spread of COVID-19 we want to encourage as many employees as possible to work from home. If you can work from home, we will support you with the infrastructure you will need to do this. IMCO is continuing to operate to enable us to fulfill our contracts and provide income for our employees. It is our intent to continue staffing our projects while maintaining a safe distance from other people, when possible and practicing vigilant sanitation measures.

The following factors influence whether personnel need to be at a jobsite or office:

- Maintaining IMCO safety standards expected on our projects and for our people.
- Meeting our contractual requirements.
- Paying our employees, billing our clients, and paying subcontractors, suppliers and vendors.
- Pursuing opportunities to secure new projects in order to maintain a healthy company into the future.
- Having the ability to be productive from home.

Please discuss with your supervisor how, when and if you are able to work from home.

**If we can support you working from home, we will do it.**

**Missing work.** Employees that need to miss work due to school/daycare closures, their own symptoms, or possible exposure to the virus will be allowed and expected to take time off. *The state and federal governments have created financial assistance programs to offset lost income that may occur. If this situation applies to you, please contact HR Director Leah Hanson at 360-770-6022 to verify eligibility.*

**Project COVID-19 Plans:** All projects and IMCO offices/facilities have a plan outlining how the requirements of this policy will be implemented at the project or location. Project/facility plans also incorporate applicable Federal, State, Local and owner rules and requirements.

**COVID-19 Supervisor:** Each project and IMCO office/facility has a designated COVID-19 Supervisor. This person's primary duties are to ensure the COVID-19 plan is completed, current and properly implemented. The COVID-19 Supervisor responsibilities include helping plan activities to support the project COVID-19 Plan, enforcing sanitation and hygiene guidelines, providing required



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training, conducting required health screens, and enforcing social distancing. The COVID-19 Supervisor may perform other duties on the job site, but their primary responsibility will be ensuring COVID-19 Plans are followed.

**Safety supplies.** Supplies in the form of masks, latex/nitrile disposable gloves, antibacterial hand sanitizer, tissues, disinfectants and/or antibacterial cleaning supplies, and disposable towels for cleaning work surfaces will be provided by the company for your use while working in the office or on jobsites, as long as supplies are commercially available. Please be mindful of proper PPE use, care, cleaning and storage to minimize waste as availability of supplies is limited.

**Travel policy.** Travel activities through public airport facilities and mass transit is limited. Only critical travel is allowed. If you need to travel through commercial airports, notify your supervisor, who will work with a senior leader to determine if your travel will be approved. No travel to tradeshow or conferences is allowed at this time. Critical travel is defined as necessary to maintain the safe operations of our projects, meet our contractual obligations to our clients, and pursue opportunities to IMCO's standard.

**Meetings.** In-person meetings must be eliminated unless critical to maintaining one of the following essential business functions:

- Maintaining the standards of safety
- we expect on our projects and for our people.
- Meeting our contractual requirements to our clients.
- Paying our employees, billing our clients, and paying our subcontractors, suppliers and vendors.
- Pursuing opportunities to continue to secure new projects.

If you are able to hold meetings via phone or video conference, you are expected to do so. IMCO is providing Microsoft Teams and Adobe Connect as two options to facilitate group meetings.

**Jobsite Visits and Visitors.** IMCO currently limits jobsite and office visits to essential, work-related activities. This will increase social distancing and help lower the risk of spreading the virus. Avoid scheduling visitors unless critical. Unscheduled visitors are not allowed to enter our offices or jobsites. Notifications should also be posted at our jobsites and offices notifying visitors of this policy.

**Subcontractors.** All subcontractors working on IMCO jobsites must adhere to our interim policy. Subcontractors may be asked to submit project-specific COVID-19 plans pertaining to their work scope, or to follow the project-specific guidelines put in place by IMCO.

**Jobsite Safety & Potential Shutdowns.** Each of IMCO's active projects have identified the critical staffing levels that must be on-site in order to maintain our safety standards and contractual obligations. If your project is nearing, at, or below its critical staffing level, contact CJ Handforth, Fred Simmons, or Tyler Kimberley, who we will determine a plan of action.



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**Communal Areas.** Shared workspaces and gathering places at our projects and offices need extra precautions, as they create a higher risk of transmitting the virus. To reduce the risk, our teams are expected to implement the following:

- Sanitize surfaces before and after eating, after prolonged use (10 mins), and at a minimum of 3 times per day, regardless of use.
- Reduce or eliminate people working in tight shared office space.
- Move meetings to more spacious outdoor settings when possible.

### Prevention.

- As a condition of employment IMCO employees are required to follow preventative measures as described by the Center for Disease Control (<https://www.cdc.gov/coronavirus/2019-ncov/about/prevention.html>)
- These preventative measures include:
  - Cleaning your hands often.
  - Avoiding close contact with people who are sick.
  - Covering coughs and sneezes.
  - Cleaning and disinfecting frequently used surfaces daily.

All IMCO employees have a responsibility to help limit the spread of this disease. In instances where one of our team members is known to have received a diagnosis of COVID-19, IMCO will implement additional protocols to protect our employees, including sanitizing, and project or office shutdowns.

### Face Coverings

The CDC and Washington Department of Health are recommending the use of cloth face coverings, in addition to social distancing, increased hand washing, and sanitation measures, as a means to further reducing the spread of COVID-19. Employees who are directed to wear face coverings due to their scope of work or who choose to wear face coverings while working must follow these guidelines.

#### When should I wear a face covering?

The CDC is recommending you wear a face covering any time you are in the presence of other people outside your home. Face coverings are *not* a substitute for social distancing, sanitation, and hand washing.

Some IMCO projects require the use of face coverings by some or all personnel. Face covering usage requirements are contained in project-specific plans.

#### When does IMCO require employees to wear face coverings?

IMCO may require face coverings in certain situations. IMCO will provide face coverings to employees required to use them. Face coverings issued by IMCO may be laundered by the employee



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or disposed of after use. Face covering requirements for specific jobsites or IMCO offices/facilities will be included in site-specific COVID-19 plans.

Pursuant to Washington State Proclamation 20-25.7 issued July 23, 2020, all personnel working in Washington State must wear a face covering anytime they are at work, unless they have no chance of contact with other persons. Specifics on how projects or locations will meet this requirement are to be included in project- or site-specific COVID-19 plans.

Face coverings are not respiratory protection. IMCO may direct employees to use respiratory protection when specific hazards are present.

### **How do cloth face coverings reduce spread?**

COVID-19 is spread when an infected person coughs or sneezes, expelling infectious particles attached to respiratory droplets into the air. The particles or droplets may be inhaled by other people or may settle on surfaces to be transferred to others who touch the surface. Preliminary research indicates cloth face coverings reduce the volume of expelled particles and the distance they travel.

Face coverings *will not* prevent you from getting infected by another person, but face coverings can reduce the likelihood of you spreading the virus to others.

### **Why would I wear a face cover if I do not feel sick?**

25-50% of people infected with COVID-19 will be asymptomatic and will *not* feel sick or experience any symptoms of infection. Infected people may also carry and transmit the virus for up to two weeks before feeling symptoms. Feeling well does not mean you are free of the virus and does not mean you cannot transmit the virus to others.

### **What type of face covering should I wear?**

Any cloth face covering that covers the nose and mouth is beneficial. Bandanas, balaclavas, or scarves made of fleece, cotton or linen are examples of coverings you may consider using. Tightly woven fabrics have proven more useful than other fabrics, but a repurposed t-shirt will work in a pinch.

It is not recommended to use medical-grade surgical masks or N95 masks for normal use, as these devices require additional training to use properly and are in limited supply.

### **What other things should I consider when choosing to wear a face cover?**

If a face covering creates a hazard during work activity, that activity may not be completed until the hazard is mitigated or eliminated. Coverings which tie around the neck or back of the head may become caught on moving parts, equipment or machinery and cause injury. Coverings may also make it harder to breath, can obstruct vision or communication, and can be unsanitary if not properly washed.

### **What sanitation guidelines should I follow?**



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- Avoid taking your face covering off and putting it back on frequently. Ideally, face coverings should be replaced after each use. Wash your hands immediately after removing or replacing a face covering.
- Replace face coverings if they become damp from perspiration or breathing, have holes or tears in them, if they are visibly soiled, or if they no longer stay in place covering the nose and mouth (i.e. they become stretched or elastic bands/ties wear out).
- Face coverings should be washed at least daily in hot water and detergent and machine dried on a hot cycle.
- Do not share face coverings.

### **May I wear an N-95 mask instead of a face covering?**

Availability of medical grade N-95 masks has been significantly reduced by the increased demand on healthcare workers. Medical grade devices should be kept available for healthcare use, as their risk of being exposed to the COVID-19 virus is substantially greater than the that of the general public.

Additionally, use of N-95 respirators (tight or loose-fitting) requires compliance with IMCO's Respiratory Protection program, the use of face coverings does not.

### **When should I use N-95 respirators or other respiratory protection?**

Employees engaged in work activity which creates a respiratory hazard are required to take precautions in accordance with IMCO's Respiratory Protection Program. Such activity includes creating silica dust, applying coatings or lubricants which contain volatile organic compounds (VOCs), or other activity which creates respiratory hazards.

IMCO may require the use of an N-95 masks during certain work activities which require close (within 6') or prolonged (10 minutes or more) contact with other workers.

Contact your supervisor or safety coordinator with any questions about respiratory hazard or respiratory protection requirements for your activity or project.

### **More Information on Face Coverings**

Washington Department of Health:

<https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/ClothFacemasks.pdf>

Center for Disease Control (CDC): <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>

### **Additional Resources.**

The Centers for Disease Control tracks the 2020 Corona virus for U.S. public health authorities and provides expert advice for those living in the United States: <https://www.cdc.gov/coronavirus/2019-ncov/index.html>



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The World Health Organization has an informative webpage on the status of the 2020 Corona virus outbreak across the globe: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>

WA State Phase I Construction Restart Requirements: [Washington Proclamation 20-25 Addendum \(04/24/2020\)](#)

[WA State Phase 2 Construction Restart Requirements](#)