

## MCA COVID-19 Preparedness and Response Plan

Introduction. This constitutes Midwest Capital Advisors, LLC's COVID-19 Preparedness and Response Plan ("Plan") that is required by the terms of Executive Order no. 2020-145 issued July 9, 2020 ("EO 2020-145") by Michigan's governor, Gretchen Whitmer,<sup>1</sup> (which superseded Executive Order No. 2020-114 issued June 5, 2020). It includes the procedures and requirements that must be followed by MCA, its employees, permitted visitors and contractors now that MCA employees are once again permitted to return to work at MCA's offices. The Plan sets forth not only the specific requirements of EO 2020-145 but also some measures that MCA believes are appropriate in light of the work performed in our offices and the rate of infection in the surrounding community.

### Specific Requirements of EO 2020-145

Worksite Supervisors. We are required to designate one or more "supervisors" to implement, monitor and report on the EO 2020-145 control strategies set forth in this Plan and to have that designee on site whenever employees are present. Because not all of MCA's employees are on-site at all times, we are designating the following persons to perform and fulfill the requirements of this position if and when they are on-site: Hank Swain, Mike DeSmyter, Jack Tunge, Mark Satkoski and Malinda Petersen. As a practical matter, Malinda will act as supervisor when she is in the office.

COVID-19 Training. We will provide COVID-19 training to all employees. That training, at a minimum, will cover workplace infection control practices, the proper use of personal protective equipment, steps to notify us of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19 and how to report unsafe working conditions. Currently that training will be provided in a video prepared by our counsel, Warner Norcross & Judd.

Daily Entry Self-Screening for Employees and Contractors. We are required to conduct a daily entry self-screening protocol for all employees and contractors entering the workplace. Currently our protocol consists of a questionnaire relating to symptoms and suspected or confirmed exposure to people with possible COVID-19. We are participating in the [Kent County Health Department's Back to Work Health Check Program](#) to provide and track our health screenings. In addition, each and every time an employee comes into the office, they must immediately wash their hands.

Physical Separation. Everyone in our office is to stay at least six feet away from one another to the maximum extent possible. We have installed markings, signs and physical barriers to help maintain this distance. Employees are to avoid going into other employee's offices or work areas to the extent possible. Meetings and gatherings that don't allow for social distancing are prohibited. Avoid using common areas such as the kitchen table and the worktable in the middle of the office. Only one person is allowed in the copier/file/mail room at a time. Please remove your print/fax jobs from the printer tray promptly. Malinda can help with large assembly or collation jobs and also get office supplies. Please check your mailbox once per day (mail is usually here by 1:00 pm).

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<sup>1</sup> EO 2020-145 (and "Guidance on Preparing Workplaces for COVID-19" published by OSHA, which is incorporated by reference in EO 2020-145) can be found [here](#).

Face Coverings. Governor Whitmer issued EO 2020-147 (the “Mask Rule”) on July 10, 2020<sup>2</sup>. Under the terms of the Mask Rule, “businesses that are open to the public” may not provide service to a customer or allow a customer to enter its premises unless the customer is wearing a face covering. While it is not 100% clear that businesses like ours (vs. “retail” businesses) are intended to be covered by the new mask requirements, we are taking the cautious approach and complying with them since we are a business that is, technically speaking, “open to the public”. We have also posted a sign notifying customers of their obligations under the Mask Rule on our front door as required by the Mask Rule.

We require that masks be worn when employees cannot consistently maintain six feet of separation from other individuals in the workplace. We will provide employees with a face covering for use in the office and building. Make sure you properly clean and store these and ask for a new one if needed. Persons in shared spaces (including without limitation restrooms and building hallways and during meetings) must wear face coverings

Facility Cleaning and Disinfection. We have increased the amount of cleaning and disinfection that would otherwise be performed, especially on high-touch surfaces, including the following:

We will make available cleaning supplies for your use. These will be located near the entry way and around the office. Employees are required to wipe down their work area (including desk, computer, keyboard, monitors, mice, and phone) at least twice per day. Employees must also wipe down parts of common areas they use. These would include, for example, the sink area, countertops, the copy machine, mail and work prep area, coffee machines, microwave, refrigerator and door/drawer handles. Do not leave dishes or utensils in the sink. We also encourage you to wipe down personal items such as keys (office and personal) and cell phones. A good ritual would be, on arrival (or return) to the office, wash your hands and wipe down your work area and devices so you are starting fresh. Additionally, extra cleaning will be conducted regularly on high touch areas such as furniture and appliance handles.

Office cleaning takes place on Saturday mornings; please be extra vigilant if you are in the office over the weekend after that time. Our cleaning service is using enhanced cleaning products and has expanded their usual routine to comply with CDC guidance for cleaning and disinfecting workplaces<sup>3</sup>.

Office Visitors. All non-essential office visitors are prohibited until further notice. Should you find the need to have visitors, please make sure you follow these steps:

1. Confirm with them in advance that they have not been exposed to anyone who has had symptoms of COVID-19 or experienced symptoms themselves;
2. Enforce the mask requirement while they are here (and, as stated above, you should wear one too);
3. Conduct the meeting after normal business hours; and
4. Thoroughly wipe down the table and chairs, door handle and any other impacted areas of the conference room and our suite (e.g., front door, Keurig, fridge etc.) after the meeting.

Travel. All non-essential travel (including in-person conferences and events) is prohibited until further notice.

Public Transportation and Public Places. We encourage employees to use personal protective equipment and hand sanitizer and to practice social distancing when in public or when using public transportation.

Remote Work. We promote and encourage working remotely to the fullest extent possible. To the extent you are able to effectively work from home (and your presence in the office is not required) for at least a portion of the work week, please do so.

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<sup>2</sup> EO 2020-147 can be found [here](#).

<sup>3</sup> <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

Staggered Work Hours. To the extent your work does not require you to be in the office at any particular time we encourage you to work at times when the office is not otherwise busy. Please let others (especially Malinda) know what schedules are ultimately put in place and try to keep them relatively consistent.

Procedures in the Event of Confirmed or Suspected Case of COVID-19. We will notify all employees if and when we learn that an individual (including contractors or suppliers or visitors) with a confirmed case of COVID-19 has visited the office. Employees are required to notify us immediately if they have been identified with a confirmed case of COVID-19. In such case, we will, within 24 hours, notify the Kent County Health Department and any co-workers, contractors or suppliers that that may have come into contact with that person. An employee with a confirmed or suspected case of COVID-19 will only be allowed to return to the workplace after they are no longer infectious according to the latest guidelines from the Centers for Disease Control and Prevention.

Our response plan for dealing with a confirmed workplace infection can be found [here](#).

Travel. All non-essential business travel (including in-person conference events) is suspended until further notice.

Office Visitors. Non-essential visitors are prohibited until further notice.

Employee Rights. In accordance with Executive Order 2020-36 and any executive orders that follow it, we will not discharge, discipline or otherwise retaliate against any employee who stays home or leaves work when they are at a particular risk of infecting others with COVID-19.

#### OSHA Guidance on Preparing Workplaces for COVID-19

In accordance with the foregoing OSHA Guidelines, we encourage frequent and thorough hand washing; we encourage you to stay home if you are sick; we encourage appropriate respiratory etiquette, including covering coughs and sneezes; we discourage using other people's phones, desks, offices or equipment; and we encourage employees to self-monitor for signs and symptoms of COVID-19 if you suspect possible exposure.

#### Other Requirements and Suggestions:

1. Comply with any building/landlord requirements (we will make sure you know what they are).
2. If you are sick or have (or reasonably could have) been exposed to anyone who is, stay at home.
3. If you feel sick while at work (especially if you have a fever or cough) seek medical attention and go home.
4. Avoid using the elevator to the extent reasonably possible.
5. Consider using the stairway handrail sparingly and only when needed.
6. Unless neither of them is in the office, Malinda and Hank will get the mail and accept deliveries. If you are expecting anything in particular, please let them know.
7. Please let at least Malinda know what your regular schedule is likely to be.
8. Being mindful of the potential for increased virus exposure from others as more people go back to work and/or relax social distancing measures. Even when the state is "re-opened", you are likely to be in contact with far more people (including many you don't know) than you have been over the last several months so take appropriate precautions.
9. Whether at the office, home or elsewhere, be even more alert and mindful than ever for phishing and other attempts to hack into our systems. This is not just a good idea; it is a 2020 focus area for the SEC. According to Schwab, almost all cyber threats begin with an inbound email.
10. We encourage all employees to become and stay familiar with CDC information about COVID-19 transmission, which can be accessed [here](#).

11. If you are concerned about how the virus or these procedures affect you or your situation or have any questions about them, please let Hank or Mike know. We will make reasonable accommodations wherever possible.
12. Please remember that the COVID 19 situation is evolving and includes many unknowns and uncertainties. Be alert to and comply with government issued notices and requirements.