

MCA COVID-19 Preparedness and Response Plan (Updated 11/15/2020)

Introduction. This constitutes Midwest Capital Advisors, LLC's COVID-19 Preparedness and Response Plan ("Plan") that is required by the terms of the Michigan Department of Labor and Economic Opportunity and the Michigan Occupational Safety and Health Administration's October 14, 2020 Emergency Rules¹. It includes the procedures and requirements that must be followed by MCA, its employees, permitted visitors and contractors to comply with the Emergency Rules. The Plan sets forth not only the specific requirements of the Emergency Rules but also some measures that MCA believes are appropriate considering the work performed in our offices and the rate of infection in the surrounding community.

Specific Requirements of the Emergency Rules.

Rule 3 (Exposure Determination): We have evaluated the routine and reasonably anticipated tasks and procedures to determine the level of potential exposure to COVID-19 while in the office. Given the nature of our business and the safety measures we have implemented (e.g., signage, cleaning and sanitation and procedures), we have determined that our employees are at a relatively low risk of exposure.

Rule 4 (Preparedness and Response Plan). This Plan is designed to comply with the requirements of Rule 4, which requires that it be consistent with current guidance for COVID-19 from the United States Centers for Disease Control ("CDC") and recommendations in "Guidance on Preparing Workplaces for COVID-19" developed by the U.S. Department of Labor Occupational Safety and Health Administration ("OSHA")². The Plan will be distributed to all employees, provided on request, and posted on our website.

Rule 5 (Infection Prevention).

1. We promote frequent and thorough hand washing and have provided places for employees and visitors to wash their hands and use the antiseptic hand sanitizers we have placed throughout the office.
2. Any employee who is sick must not come into the office.
3. Employees are prohibited from using other workers' phones, desks, offices or other work tools and equipment whenever possible.
4. We have increased the amount of cleaning and disinfection that would otherwise be performed, especially on high-touch surfaces, including the following:
 - a. 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.
 - b. 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.
 - c. 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.
 - d. 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

¹ The Emergency Rules can be found at https://www.michigan.gov/documents/leo/leo_miosha_COVID-19_Emergency_Rules_705296_7.pdf.

² This can be found at <https://www.osha.gov/Publications/OSHA3990.pdf>.

expanded their usual routine to comply with CDC guidance for cleaning and disinfecting workplaces³.

5. Prohibition of Most In-Office Work.
 - a. As required by the Rule, our policy is that in-person/on-site work is not permitted to the extent that it can feasibly be accomplished remotely. The Michigan Department of Health & Human Services (MDHHS) has interpreted this portion of Rule 5 as being a “strict requirement”, which in MDHHS’s opinion means that in-person/on-site work is only permitted if an employee is “unable to physically complete his or her job tasks in a remote setting.”
 - b. We interpret the foregoing requirement to permit on-site/in-person work in our office in circumstances, that include (but are not necessarily limited to) the following:
 - i. Where use of non-portable or shared office equipment is needed.
 - ii. To pick up mail or other deliveries.
 - iii. To work with files or other client materials that for security reasons cannot be taken from the office.
 - iv. Where clients or prospective clients require an in-person meeting and you have determined that the office is safer than alternative meeting locations.
 - v. Where electronic meetings or other communication from home is not possible.
 - c. To the extent that permitted in-office work does not require you to be in the office at any particular time we encourage you to work at times when others are not there. Please let others (especially Malinda) know what schedules are ultimately put in place and try to keep them relatively consistent.

Rule 6 (Health Surveillance).

1. 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 temperature, 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, every time an employee comes into the office, they must immediately wash their hands or use hand sanitizer.
3. All employees are required to promptly report to one of the “safety coordinators” identified below any signs or symptoms of COVID-19 that they are experiencing.
4. We will physically isolate any employee known or suspected to have COVID-19 from the remainder of the workforce.
5. 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 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.
6. Employees with a known or suspected case of COVID-19 may only return to the workplace (subject to the requirements of Rule 5) if they are no longer infectious (according to CDC guidelines) and they are released from any quarantine or isolation required by the Kent County Health Department.

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

Rule 7 (Workplace Controls).

1. We are required to designate one or more “safety coordinators” to implement, monitor and report on the COVID-19 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.
2. We have placed posters encouraging employees to stay away from the office when sick, cough and sneeze etiquette and proper hand hygiene practices.
3. 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 do not 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 get office supplies. Please check your mailbox once per day (mail is usually here by 1:00 pm).
4. 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. We require all visitors to wear masks while in the office.
5. In accordance with the OSHA Guidelines referenced above, 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.

Rule 10 (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, and can be viewed by clicking [here](#).

Rule 11 (Recordkeeping). We will maintain a record of the training, screening protocols and notifications as required by Rule 11.

General.

1. Office Visitors. All “non-essential” office visitors are prohibited until further notice. Should you find the need to have visitors, please adhere to the following:
 - a. If the potential visitor is a client or potential client that needs or is considering essential services that we provide:
 - i. First, encourage them to meet with us remotely via electronic communications.

- ii. If they are unwilling or unable to meet remotely, they may come to our office for an appointment on the following terms:
 - a. Confirm with them in advance of their visit (and once they get here as well) that they have not been exposed to anyone who has had symptoms of COVID-19 or experienced symptoms themselves;
 - b. Use the thermometer to ensure that they do not have a fever;
 - c. Document (i) and (ii);
 - d. Enforce the mask requirement while they are here (and, as stated above, you should wear one too); and
 - e. Follow posted conference room capacity and cleanup restrictions.
 - b. When scheduling an in-office meeting, please follow these rules:
 - i. Conduct the meeting after normal business hours if reasonably possible;
 - ii. If not reasonably possible, schedule the meeting so it does not occur at a time when others are likely to be in the office (after hours or on Fridays is preferred);
 - iii. Let all office personnel know of the date, time and expected duration of the meeting and that you will re-schedule the meeting if it conflicts with time(s) they intend or need to be in the office and/or they are otherwise uncomfortable being in the office during the meeting; and
 - iv. Mark the meeting on the conference room Outlook calendar.
 - c. Immediately after the meeting, 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.).
2. Travel. All non-essential travel (including in-person conferences and events) is prohibited until further notice.
3. 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.
4. Employee Rights. We will comply with all laws that prohibit discharging, disciplining or otherwise retaliating against any employee who stays home or leaves work when they are at a particular risk of infecting others with COVID-19.
5. Other Requirements and Suggestions:
 - a. Comply with any building/landlord requirements (we will make sure you know what they are). Current landlord requirements can be found here.
 - b. If you are sick or have (or reasonably could have) been exposed to anyone who is, stay at home. If you feel sick while at work (especially if you have a fever or cough) seek medical attention and go home.
 - c. Avoid using the elevator to the extent reasonably possible and consider using the stairway handrail sparingly and only when needed.
 - d. 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.
 - e. 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.

- f. We encourage all employees to become and stay familiar with CDC information about COVID-19 transmission, which can be accessed [here](#).
- g. 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.
- h. 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.