



ATHFAR 828, INC.

COVID-19 Preparedness and Response Plan

Background:

ATHFAR 828, Inc., a Florida corporation with its manufacturing facility in Big Rapids, Michigan, is subject to Michigan Executive Orders 2020-96 ("Order 2020-96") and 2020-97 ("Order 2020-97"), both issued on May 21, 2020, and was subject to all related Orders which preceded it, beginning with Michigan Executive Order 2020-21 (the "Initial Order"), issued on March 23, 2020 (collectively, the "Michigan Stay at Home Orders").

On March 25, 2020, in response to the Initial Order, ATHFAR designated all of its employees working in its Big Rapids, Michigan, manufacturing facility as critical infrastructure workers, as described by the Director of the U.S. Cybersecurity and Infrastructure Security Agency in his guidance of March 19, 2020 on the COVID-19 response. This list of workers includes, among others, the following:

- Manufacturers, technicians, logistics and warehouse operators, and distributors of medical equipment...
- Workers necessary for the manufacturing of materials and products needed for medical supply chains...

ATHFAR manufactures and supplies products that fall under the category of medical equipment and are needed for medical supply chains. As a result, all ATHFAR employees are deemed to be critical infrastructure workers and are exempted from the Michigan Stay at Home Orders. Thus, ATHFAR has continued manufacturing operations, with the addition of instituting the "Social Distancing Requirements" of the Stay at Home Orders and following the recommendations and guidelines outlined by the Centers for Disease Control and Prevention.

Order 2020-96 recognizes manufacturing as a class of "resumed activities", but only if specified workplace safeguards are adopted by the manufacturing facility. Order 2020-97 creates "an enforceable set of workplace standards that apply to all businesses across the state" and includes additional workplace standards applicable to manufacturing facilities. Even though ATHFAR was allowed to remain open for business because its workers are deemed to be critical infrastructure workers, as a manufacturing facility, ATHFAR will be subject to the latest "stringent precautionary measures" applicable to the resumed activities of manufacturers.

This COVID-19 Preparedness and Response Plan (the "Plan") has been adopted by ATHFAR to reduce the risk of spreading the Coronavirus and incorporates both the existing COVID-19 Protocols and the additional precautionary measures mandated by Order 2020-97.

A. Protocols for Employees:

1. Employees must enter the facility only at the specified dedicated entry point at the facility.
2. Employees must stop at the physical barrier "STOP" sign, complete the daily questionnaire, and comply with daily screening protocols before proceeding further into the facility. No more than one arriving employee is allowed to be at the entry barrier at any time. If, upon arrival at the facility, an employee is already at the "STOP" sign, all other arriving employees must wait outside the facility at least six feet from each other until the first employee has proceeded into the facility after completing the daily screening protocol or has left the area.
3. Employees will not be allowed past this entry barrier until they read the posted questionnaire and confirm by email or text to corporate@ATHFAR828.com, that:
 - (a) They are **not** experiencing any COVID-19 symptoms,
 - (b) They have **not** been in contact with anyone suspected or confirmed to have COVID-19, and
 - (c) They have taken their temperature with the thermometer provided, and do not have a temperature greater than 100 degrees. Employees must sanitize the thermometer before and after each use with the disinfectant wipes provided at the entry point.

Employees will not be allowed past the barrier if they answered "yes" to any of these questions. In addition, if, at any time, any employee feels ill or believes they have been exposed to COVID-19, they must go home or call 911 and notify the Supervisor as soon as possible. In addition, employees must notify the Supervisor as soon as possible upon learning they have a confirmed COVID-19 diagnosis.

4. Employees must wash their hands using soap and water for at least 20 seconds before beginning their work, at the end of their work shift, and after eating, using the restroom, handling mail, packages, or deliveries, etc.
5. Employees must keep disinfectant wipes and/or hand sanitizer beside them to disinfect their hands and wipe down other objects, including but not limited to any tools, equipment, keyboards, mouses, phones, pens, pencils, or other used objects, as applicable.

6. Each employee must maintain a minimum of 6 feet distance from others as much as possible. Where applicable, strips of tape will be placed on the floor every 6 feet to remind the employees of this protocol and to indicate proximity.
7. Employees must wear a face covering that covers the nose and mouth (while still maintaining a 6-foot distance) except in the break room, unless they notify the Human Resources Director ("HR Director") that they are not able to medically tolerate such a face covering. If an employee is medically unable to tolerate a face covering, the HR Director will discuss an alternative solution with that employee, such as a face shield.
8. Employees must clean their workstation by a handheld vacuum and then thoroughly wipe down the vacuum and any surface area of the workstation with a disinfectant wipe or cleaner before and after each shift or change of employee at the workstation.
9. Employees must wipe down with a disinfectant wipe or cleaner each tool and piece of equipment at every workstation used by the employee before and after each shift or change of employee at the workstation. Employees may not share tools or equipment to the maximum extent possible.
10. Only one employee is permitted to be in the lunch break or rest break area at a time and no shared foods are allowed. Each employee is responsible for cleaning the lunch and/or break area with disinfectant wipes or cleaner after each use. Employees are reminded to adhere to 6 feet social distancing guidelines during any lunch or rest break.
11. Employees are encouraged to use personal protective equipment and hand sanitizer on public transportation.

B. Protocols for Facility and Management:

1. ATHFAR has designated [REDACTED] to be the worksite supervisor (the "Supervisor") as contemplated by Order 2020-97 to implement, monitor, and report on the protocols and strategies included in this Plan. If for any reason, the Supervisor is temporarily unavailable or unable to serve in this role, she shall inform the HR Director who, after consultation with the President, shall appoint an interim Supervisor. The Supervisor must remain on-site at all times when employees are present on-site.
2. ONLY employees will be permitted to enter the facility. No in-person interviews will be conducted. All deliveries must be made outside the dedicated entrance to the facility. If an employee needs to speak to the person delivering a package, the delivery person should not enter the facility and the employee should wear their mask and keep a 6 foot distance. Packages must be sprayed or wiped down with disinfectant wipes or cleaner by employees as such packages are received and put away. Employees

should wash their hands for at least 20 seconds after handling and disinfecting packages.

3. In the unlikely event that contractors, suppliers, or any other individuals are required to enter the facility, they shall be required to comply with the protocols for Employees specified in Section A.
4. ATHFAR will ensure that disinfectant wipes are placed at the entry barrier, and that disinfectant wipes, hand sanitizer, antibacterial soap, disinfectant cleaner, and non-medical grade face coverings are made readily available to employees at the facility, to the extent possible. ATHFAR will encourage its employees to wash their hands frequently.
5. ATHFAR will ensure that, at least once weekly, the facility receives a full "top to bottom" cleaning-dusting, disinfecting, vacuuming, trash removal, etc. In addition, in the event anyone in the workplace tests positive for COVID-19, employees will be asked to leave the facility until such time as the facility receives a full top to bottom disinfection cleaning.
6. ATHFAR will ensure that non-workstation, high touch areas, such as handles, doorknobs, phones, light switches, countertops, tables, desks, keyboards, mouse/mousepads, appliances, toilets, faucets, and sinks, are wiped down with disinfectant wipes or other equivalent disinfectant cleaner, as appropriate, periodically throughout the day, and at the end of each day.
7. ATHFAR will provide COVID-19 training to employees and post in the facility applicable informational posters from the CDC website or otherwise, which cover:
 - a. workplace infection-control practices,
 - b. the proper use of personal protective equipment, including the proper steps for putting it on and taking it off,
 - c. the steps an employee must take to notify the Supervisor and HR Director of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19,
 - d. routes by which the coronavirus is transmitted from person to person,
 - e. distances that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces, and
 - f. how to report unsafe working conditions.

In addition, ATHFAR will reference its COVID-19 Protocol, CDC materials, and other relevant information on the reverse of the barrier sign (facing into the facility's workspace) to serve as a reminder to employees of these important guidelines.

8. If the Supervisor observes one or more employees violating these protocols, the Supervisor will ask the employee to correct their actions and will have them reread the Employee Protocols. Repeated or willful violations may result in suspension or termination of employment.
9. ATHFAR will continue to implement employee rotational shift schedules where possible to reduce the number of workers in the facility at the same time.
10. Upon learning of a positive case of COVID-19 involving an individual who had access to the facility within the 14-day period prior to the appearance of symptoms, the Supervisor shall immediately, and in any event within 24 hours, notify:
 - a. ATHFAR's CEO, COO, and HR Director,
 - b. The local health department,
 - c. Any co-workers, contractors, or suppliers who may have come into contact with the individual who tested positive for COVID-19.

All potentially exposed individuals immediately will be sent home and not allowed to return to the facility until the deep cleaning specified by Section B.5. above has been completed and the CDC-recommended quarantine period has expired or they have been tested positive for the coronavirus antibody. The HR Director shall maintain a central log for symptomatic workers or workers who have tested positive for COVID-19. ATHFAR will not allow employees with a confirmed or suspected case of COVID-19 to return to the workplace until after they are no longer infectious according to the latest guidelines from the CDC.

C. Miscellaneous Precautionary Measures and Actions:

1. ATHFAR will send this Plan by email or letter to all of its employees and will make it readily available to its customers on its website.
2. ATHFAR will promote remote work to the fullest extent possible and will prohibit social gatherings and meetings that do not allow for social distancing.
3. All business-related travel will be limited to essential travel only and must be approved in writing by the CEO.
4. ATHFAR will not accept returned products during the continuation of the COVID-19 pandemic.
5. Additional infection-control measures that are reasonable in light of the work performed at the facility and the rate of infection in the surrounding community will be considered on an on-going basis.

6. ATHFAR will not discharge, discipline, or otherwise retaliate against employees who stay home or who leave work when they are at particular risk of infecting others with COVID-19.