



SWP-060

Pandemic Preparedness Plan

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1. Purpose

The purpose of the Pandemic Preparedness Plan is to manage the impact of a pandemic or other public health crisis on employees and business activities using main strategies which include:

- Containment of the disease by reducing spread within SET.
- Maintaining continuity of critical services if containment is not possible.

2. Scope

The Pandemic Prevention Plan responsibilities, preparedness activities and response activities are integrated with the following SET plans and programs:

- SET Business Continuity Plan
- Division Contingency / Emergency Response Plans
- Bloodborne Pathogen Program (SWP-001)

3. Definitions

Pandemic is a worldwide spread of a new disease. A pandemic occurs when a new virus emerges and spreads around the world, and most people do not have immunity. Viruses that have caused past pandemics have typically originated from animal influenza viruses. The disease spreads easily person-to-person, will cause serious illness, and can sweep across the country and around the world in very little time.

4. Organization & Responsibilities

The Pandemic Response Plan (PRP) is maintained and updated by the Pandemic Response Team with input and support from others as required.

4.1. Pandemic Response Team (PRT)

The PRT is the working team that is responsible for coordinating activities across SET during a pandemic or other public health emergency. In the event of a pandemic, the PRT shall provide overall coordination and shall:

- Determine when and if the containment / social isolation strategies shall be initiated, such as:
 - Enhanced cleaning protocols
 - Travel restrictions
 - Conducting meetings via teleconference
 - Working at home or remotely
 - Minimizing human-to-human contact
 - Sharing information electronically
 - Limiting non-essential work
- Communicate critical and essential functions.
- Coordinate communications across SET.

The core members of the PRT and primary responsibilities include:

4.2. Team Lead (CEO, President)

Top SET Leadership (CEO and/or President) shall serve as the team Lead and are responsible for overall coordination of the PRP. They shall assign ownership of the PRT to respective team members for managing disease issues and related impact to SET employees and the company. Key responsibilities include:

- Assess business risks and priorities.
- Convene and schedule periodic meetings and updates of the PRP.
- Review composition of the team and call up support if necessary.
- Assess immediate priorities and actions.
- Identify issues and develop policy, strategy and communications to minimize impacts.
- Cancel non-critical meetings and public gatherings.
- Implement business contingency plans (e.g. reduced teams, shutdowns).
- Monitor and advise on media issues.

4.3. Health & Safety

- Monitor and advise on emerging HSE issues.
- Implement systems with HR for monitoring health and hygiene procedures.
- Help develop and distribute policy and guidelines.
- Provide technical support, guidance and interpretation of guidelines.
- Audit and evaluate operations and compliance with guidelines.
- Ensure operations can continue to run safely and shut down those that cannot.
- Conduct employee training.

4.4. Human Resources

- Provide communication to employees on these issues and policies.
- Monitor and advise on emerging HR issues (e.g. overtime payments, relocation, split shifts, etc.).
- Advise on home working policy and who will qualify.
- Monitor levels of sickness absence. (Supervisors to inform HR representatives daily of absence levels in their respective sections including those that are able and available to return to work.)
- Advise on overall availability of staff and deployment to areas of need.
- Provide EAP for counselling staff and relatives.
- Facilitate contact investigation and follow-up with public health authorities.
- Advise the PRT on employee confidentiality requirements.

4.5. Finance

- Monitor and advise on emerging financial issues (e.g. contracts, expenses, payments etc.)
- Monitor and advise on emerging Legal issues (e.g. contractual issues, liabilities, etc.)
- Review / approve contracts for subcontractors required.
- Assess insurance implications and liaise with external parties as necessary.
- Monitor financial impacts of the pandemic on the business.
- Identify and release payments as agreed by the PRT / Team Lead.

4.6. Information Systems

- Ensure critical business systems continue to operate.
- Ensure critical communications systems are available to those that need them.
- Coordinate prioritization of key applications in the event that system capacity is reduced.

4.7. Sales / Customer Support

- Ensure effective communication is maintained and support provided to SET clients.
- Monitor and assess requests for services from clients and communicate to PRT/Operations the anticipated resources needed to help ensure continuity of business and services.
- Coordinate prioritization of key accounts / projects in the event system capacity is reduced.

4.8. Division / Site Managers

- Implement contingency plans and practices.
- Provide regular updates to staff.
- Inform staff of the importance of basic personal hygiene.
- Provide enhanced cleaning and hygiene services.
- Inform staff not to attend work if sick.
- Respond to requests for information / advice.
- Log all actions, tasks and ongoing issues and ensure these are addressed.
- Develop and maintain lists of key staff and alternates.
- Identify and organize arrangements for working from home / alternate locations.
- Ensure arrangements are in place to monitor / restrict visitors and to host virtual meetings.
- Support and work alongside HR, HSE and Finance to provide welfare, catering, transport and other support for essential workers.
- Support and work alongside IT in ensuring systems are in place for identifying and preserving critical information or knowledge.

5. Monitoring External Communications

The Director, HSE shall actively monitor information relating to any emerging public health issues including pandemics. The following sources may be utilized to obtain public health issues:

- Center for Disease Control (CDC) <https://www.cdc.gov/>
- World Health Organization (WHO) <https://www.who.int/>
- US Department of Health & Human Services <https://www.hhs.gov/>
- OSHA <https://www.osha.gov/>

Director, HSE shall maintain contact with appropriate representatives from the PRT during a pandemic or other public health emergency and in preparation for such an event. The PRT Team Lead shall communicate changes made to the PRT to ensure continuity.

6. Activation of the Pandemic Response Plan (PRP)

The designation of the global phases of a pandemic will be made by the WHO and SET will follow this guidance. The first actions that should be taken by the lead in the event of a pandemic:

1. Convene the Pandemic Response Team.
2. Communicate the situation openly to staff.
3. Implement health and hygiene measures for staff and families.
4. Issue local travel advice and implement tracking procedures.
5. Assess business priorities and next actions.

The PRT Team Lead shall convene the team and meetings scheduled in response to escalations in the pandemic similar to the WHO alert conditions levels as follows.

Phase	Description	Response
0	No pandemic concerns	<ul style="list-style-type: none"> • Implement normal good health practices (frequent handwashing, common areas cleaned frequently, hand sanitizer available)
1	News of a specific potential pandemic threat is circulated by health authorities with reports of cases outside the U.S.	<ul style="list-style-type: none"> • Monitor disease progress • Review Pandemic Preparedness Plan • Provide general disease information to employees as deemed appropriate.
2	News of a specific potential pandemic threat is circulated by health authorities with reports of cases within the U.S.	<ul style="list-style-type: none"> • Continue to monitor disease progress • Review Pandemic Preparedness Plan • Begin non-invasive mitigation measures (more frequent handwashing, common areas cleaned more frequently, distribute hand sanitizer available)
3	Health Authorities report that a pandemic disease is present within the U.S., but few reported cases are present in regions SET operates.	<ul style="list-style-type: none"> • Continue to monitor disease progress • Consider enacting Pandemic Preparedness Plan • Consider invasive mitigation measures (limit face-to-face meetings, limit travel, etc.)
4	Health Authorities report that a pandemic disease is present in regions SET operates.	<ul style="list-style-type: none"> • Enact Pandemic Preparedness Plan • Begin invasive mitigation measures (limit face-to-face meetings, limit travel, etc.)
5	Cases confirmed within SET.	<ul style="list-style-type: none"> • Implement aggressive mitigation measures (exercise work from home plans, reduce human interfaces, etc.)
6	Widespread impacts to SET Employees.	<ul style="list-style-type: none"> • Continue to manage event using Pandemic Preparedness Plan and appropriate division-level response.

6.1. Communication

HSE and HR shall work with the Team Lead to ensure that the appropriate public health alert information is provided in a timely manner to employees during a pandemic or other public health emergency. This will include sharing external and internal alert conditions associated with pandemic phases and required actions. Employees will receive public health alerts once conditions escalate to the point where a specific pandemic threat is circulated by Health Authorities (e.g. CDC, World Health Organization). Existing communications resources shall be used during a pandemic. This may include Email and the SET internal website.

VP Sales shall work with the PRT to ensure that the appropriate information is provided in a timely manner to customers and suppliers in the event a pandemic outbreak has or may impact SET's ability to perform services for SET clients. The provisions of the Business Continuity Plan will be followed to help ensure SET can continually provide core services to clients in the event of a pandemic outbreak.

6.2. Business Continuity

SET Environmental, Inc. has an established a Business Continuity Plan designed to ensure SET can continually provide core services to clients in the event a major disaster renders one or more of SET's branch locations incapable of daily functional activities. SET maintains a corporate office in Oakbrook, IL and operates sixteen branch service locations in 8 states. Redundancy of resources are available within SET's network of facilities and various partnerships with our subcontractors and suppliers.

The following Pandemic Continuity Plan has been established specifically with regards to a pandemic outbreak to ensure SET can carry out its essential functions and services. This guidance stresses that essential functions can be maintained during a pandemic outbreak through mitigation strategies, such as social distancing, increased hygiene and similar approaches. A pandemic outbreak may not, in itself, require a traditional continuity response, such as partial or full relocation of SET's essential functions, although this response may be concurrently necessary due to other circumstances as detailed in SET's Business Continuity Plan.

a. Concept of Operations

SET will monitor the severity of the pandemic outbreak and establish continuity activation triggers to address the unique nature of the threat. The Pandemic Continuity Plan will be implemented as needed to support the continual performance of essential functions.

b. Continuity Planning

SET employees shall be informed of protective actions and/or modifications related to this plan. Messaging and risk communications will be coordinated by the PRT Team Lead. This will include guidance and instructions on established infection control measures such as social distancing, personal protective equipment and telework policies to assist in limiting the spread of pandemic.

Within the workplace, social distancing measures may take the form of:

- Modifying the frequency of face-to-face employee encounters (e.g. placing moratoriums on hand shaking, substituting teleconferences in place of face-to-face meetings, posting infection control guidelines)
- Establishing flexible work hours and/or work sites (e.g. telecommuting)
- Promoting social distancing between employees and customers
- Implementing strategies that request and enable employees to stay at home when experiencing the first signs of symptoms of illness.

SET Managers shall be encouraged to communicate with employees, particularly any who are in harm's way. These messages should follow the message from the PRT Team Lead. Frequent, daily contact is important to keep employees informed about developments in SET's response, impacts on the workforce, and to reassure employees that SET is continuing to function as usual. Component-specific risk assessments that identify actual control band designations of key personnel shall be conducted and updated periodically. The PRT shall include deliberate methods to measure, monitor and adjust actions to changing conditions and improved protection strategies.

Some examples of these strategies include:

- Ensure essential personnel available for critical functions / tasks.
- Assess and track inventory of required supplies needed to perform essential functions.
- Reaffirm essential suppliers have their material and personnel on-hand are able to respond and support as needed.
- Acquire and stockpile basic supplies to support operations and related critical support services.
- Implement workplace protection strategies with metrics to assess worker conformance and workplace cleanliness.
- Track and implement changes in approved or recommended protection measures.
- Coordinate with clients, local public health and emergency points of contact, and other stakeholders to ensure open and adequate communications.

c. Planning Assumptions

SET shall refer to guidance from the CDC and other appropriate regulatory sources in planning assumptions associated with the Pandemic Continuity of Operations Plan. Updates will be incorporated into the Background, Risk Assessment, and Procedures & Safe Work Practices sections of this plan.

d. Pandemic Response & Continuity Capability

The PRT Team Lead shall oversee the Pandemic Response Team to anticipate the impacts of the pandemic outbreak at SET and to assist with developing strategies to manage the effects of the outbreak. This shall include the essential functions and services needed for SET to sustain its operations. Each member shall identify orders of succession that are at least three deep per position.

7. Prevention and Containment

The key methods identified to prevent the effects of a pandemic outbreak to SET employees and the company include:

- Access to information
- Basic infection prevention measures, such as: handwashing, respiratory hygiene, and routine environmental cleaning.
- Identification and isolation
- Containment, including social distancing, cleaning, offsite work, and travel restrictions.

7.1. Access to Information

The PRT Lead shall ensure that employees have adequate information on pandemic / public health emergency issues to allow employees to make informed decisions regarding illness prevention. During a public health emergency, notices will be posted / distributed regularly to employees to address concerns and to reduce stress and anxiety. Any employee concerns on public health issues should be directed to the employees supervisor, HR or HSE. Additional support is available through All One, SET's Occupational Health Provider, and the SET Employee Assistance Program (EAP).

7.2. Basic Infection Prevention Measures

a. Annual Influenza Vaccinations

Annual influenza vaccinations build resistance to influenza strains and prevent illness. Access to influenza vaccinations will continue to be recommended and supported across SET.

b. Basic Infection Prevention Measures

Personal hygiene can effectively minimize the transmission of influenza and other illnesses and should include:

- Avoid close contact with people who are sick.
- Avoid touching your eyes, nose and mouth with untouched hands.
- Wash your hands often with soap and water for at least 20 seconds. Use an alcohol-based sanitizer that contains at least 60% alcohol if soap and water are not available. SET shall ensure that all employees have access to hand washing facilities, hand sanitizers, tissues and no touch trash cans.
- Cover your cough or sneeze with a tissue, then throw the tissue in the trash.
- The CDC has published simple guidance to help prevent infection from spread of pandemic disease which includes the following:

Practice good hygiene



- Stop handshaking – use other noncontact methods of greeting
- Clean hands at the door and schedule regular hand washing reminders by email
- Create habits and reminders to avoid touching their faces and cover coughs and sneezes
- Disinfect surfaces like doorknobs, tables, desks, and handrails regularly
- Increase ventilation by opening windows or adjusting air conditioning

Be careful with meetings and travel



- Use videoconferencing for meetings when possible
- When not possible, hold meetings in open, well-ventilated spaces
- Consider adjusting or postponing large meetings or gatherings
- Assess the risks of business travel

Handle food carefully



- Limit food sharing
- Strengthen health screening for cafeteria staff and their close contacts
- Ensure cafeteria staff and their close contacts practice strict hygiene

Stay home if...



- They are feeling sick
- They have a sick family member in their home

7.3. Identification and Isolation

Isolation of individuals during an illness prevents the spread of infectious disease through the workplace. Isolation periods shall be based on Public Health guidance or recommendations from SET's occupational health provider. If an employee feels ill, or if someone observes that a person is exhibiting symptoms associated with a pandemic, the employees' supervisor or HR shall be contacted. The employee supervisor, with support of HR shall:

- Avoid direct contact with the person by managing the process over the phone if possible.
- Confirm symptoms with the employee to determine if it is a suspect case.
- Assist the employee to leave the worksite, avoiding the use of public transportation if possible, and contact a health professional as appropriate.
- Consider identifying other individuals who have had recent contact with the suspect case and consider requiring these individuals or contractors to return home.
- Ensure the employee's workstation is cleaned and disinfected.
- Continue to monitor the health of coworkers in the work area.
- Check with suspect case employee during a work absence and confirm criteria for return to work.

7.4. Containment Activities

1) Social Distancing

Social distancing refers to strategies to reduce the frequency of contact between people. Strategies that shall be considered include:

- Reduced face-to-face meetings, increasing the use of telephone and video conferences, and increase reliance on the electronic exchange of information.
- Minimize meeting times and meeting in large rooms, reducing contact.
- Whenever possible, physical contact with coworkers should be minimized (e.g. avoid handshaking, avoid lunch/break rooms)
- The use of shared workstations should be minimized or increased cleaning between use should occur.
- Employees should be encouraged to avoid public transportation when possible.
- Consider flexible work hours, staggered shift changes and staggered lunch hours.
- Avoid unnecessary travel.
- Avoid cafeterias and restaurants.

2) Cleaning

General / Site Managers shall:

- Ensure routine cleaning of frequently touched surfaces, such as telephones, workstations, countertops and doorknobs is being performed by a cleaning service or employees. Unless otherwise directed, cleaning agents that are normally used for these surfaces may be used.
- Direct employees to avoid sharing cups and glasses and to wash glassware with hot soap and water between uses.
- Make disposable wipes available to employees so that commonly used surfaces can be wiped down by employees before each use. No touch trash cans shall be provided for disposal of wipes.
- Remove magazines and newspapers from common areas.

3) Offsite Work Capabilities

Working from home (telecommuting) and use of offsite locations are valuable tools that SET can use to contain the spread of illness during a pandemic outbreak. Employees who have the ability to work from home will be directed to do so as authorized by a SET Branch Manager or above. SET will consider use of fully redundant facilities that might be utilized during a pandemic outbreak as part of the company Business Continuity Plan.

4) Travel

During a pandemic or other public health emergency, the PRT shall assess company requirements and review travel plans to limit travel as appropriate. HSE shall monitor travel advisories associated with public health concerns. Travel advisories shall be established by the PRT Lead and these communicated to employees to avoid the potential for travelers to avoid being stranded overseas. The PRT Lead shall establish travel restrictions that will be communicated to employees to address pandemic emergencies

and prevent travel to infected areas. For employees returning from a restricted area, appropriate health monitoring and/or quarantine measures may be implemented. HSE / HR shall assist in this process.

8. Treatment

8.1. Antiviral Treatment

Antiviral treatments are currently available to treat certain viral infections such as influenza. Tamiflu (oseltamivir phosphate) is an anti-viral treatment currently used to treat influenza. Typically, Tamiflu must be administered within two days of infection. Not all individuals are eligible for treatment and a licensed physician or other licensed health care provider should administer all treatment.

If a pandemic occurs, it is expected that it may take between 3 6 months to develop an effective anti-viral treatment or vaccine. Employees should contact their personal health provider if they have any specific questions or concerns.

8.2. Access to Health Care

Employees currently have access to health programs through SET-assisted benefit programs, social programs and employee assistance programs. Additionally, employees have access to Occupational Health medical providers. HR shall continue to review these programs to ensure they are appropriate for employee needs. The current program provides for sick leave.

During a pandemic emergency, the existing benefit, health services, and employee assistance programs will be reviewed by HR to determine if supplemental assistance is appropriate. This could include:

- Special policies for extended leave.
- Additional employee compensation and/or sick leave.
- Additional support for access to influenza vaccines and/or anti-viral medications.

9. Preparedness

9.1. Training

Employees shall receive periodic information / training on the health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread the disease, and when it is appropriate to return to work after illness. Training shall include disease containment measures implemented and employee expectations. Consideration shall be given for non-English speaking employees or those with disabilities as applicable.

9.2. Review

Following a pandemic event, the PRT Lead shall convene the PRT to assess the effectiveness of the Pandemic Prevention Plan. This shall include identifying opportunities for improvement and

implementing corrective actions to facilitate improved capabilities and execution of future responses pandemic events.

10. Appendices

The following appendices are included as part of this plan:

- Appendix A Example Influenza Notification
- Appendix B Pandemic Response Team Members and Alternates
- Appendix C Pandemic Health Case Notification Form
- Appendix D COVID-19 Illness Prevention and Business Continuity Plan.

11. Document Record of Change

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Reviewed by:	SET Senior Management Team		
Approved by:	Dave DeVries, CEO	Approval Date:	3/16/2020

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