

CAPTRUST

COVID-19 – Workplace Plan

CAPTRUST is committed to providing a safe and healthy workplace for all our employees. To ensure that, we have developed the following workplace plan in response to the COVID-19 pandemic. Our goal is to mitigate the potential for transmission of COVID-19 in our workplaces, and that requires that all employees are both accountable for monitoring their own symptoms and health and are fully compliant with this plan and any related firm policies. Only through this cooperative effort can we establish and maintain the safety and health of our colleagues, clients, and communities.

The CAPTRUST COVID-19 Workplace Plan dated May 14, 2020

Basis

On April 16th 2020, the Federal government released its guidelines on the three phases of Opening Up America Again¹. Click [here](https://www.whitehouse.gov/openingamerica/) to read in detail. ¹ Under the Federal government's guidelines, state Governors and local public health officials will determine exactly when and under what conditions their local economies will reopen. Unless explicitly noted in future policy releases or official written firm communication, the phases outlined in the CAPTRUST COVID-19 Workplace Plan will correlate with the same numbered phases by state or other office locale.

The applicability of the guidelines we are outlining today in our own Workplace Plan largely depends on which phase is in effect for your local area at any given time. As more fully described in the Federal government guidelines, the duration of each phase will also vary, but will likely be at least 14 days. **Until further notice, we are all operating in Phase 1. We will migrate to other Phases on a location specific basis, in consultation with HR. We anticipate lagging each jurisdiction's timeframe, as states and cities may be impacted by political or other factors.**

Employees should adhere to the more restrictive of the guidelines outlined in this Workplace Plan, or the guidelines in effect for each regional office's state, or locale. CAPTRUST will regularly review this practice and may amend it going forward with reasonable notice to our employees.

As many of our employees can be productive and effective working remotely, until further notice, reentering the workplace is voluntary. We will offer a staged approach to returning to the workplace in all locations. All employees must acknowledge their obligations under the COVID-19 workplace plan in My Compliance Office (referenced in Appendix B) by May 22nd, regardless of intent to return to the office. CAPTRUST will prioritize available space for: functions that are more effectively performed in the office environment and employees who are less productive remotely.

¹ <https://www.whitehouse.gov/openingamerica/>

Phase One

- **Business travel will not be permitted.** To the extent possible, we encourage you to host such meetings via conference call or Microsoft Teams. The Help Desk is available to help you organize “virtual meetings.”
- **Visitors (i.e., persons not employed by CAPTRUST) will not be permitted in any of our offices.**
- **Vulnerable employees (age 65+ and/or have an underlying medical condition causing you to be at a higher risk for severe illness) should continue to work remotely to the extent possible and feasible.** To determine whether or not you are a vulnerable employee, please visit [the CDC website](#) and consult your health care provider.

Phase Two

- **Non-essential business travel will not be permitted.** Department Heads are empowered to decide whether business travel is “essential” and the HR team is available to provide support to ensure such determinations are consistent company-wide.
- **Visitors (i.e., persons not employed by CAPTRUST) will not be permitted in any of our offices except for essential business purposes.** Before inviting a visitor to any of our offices, you should first check with your Department Head. While we need to keep operating as normally as possible with our clients, vendors and other business partners, please try to limit person-to-person contact as much as possible and rely instead on conference calls and other virtual meeting alternatives.
- **Vulnerable employees (age 65+ and/or have an underlying medical condition causing you to be at a higher risk for severe illness) should continue to work remotely to the extent possible and feasible.** To determine whether or not you are a vulnerable employee, please visit [the CDC website](#) and consult your health care provider.

Phase Three

- We currently anticipate everyone who is able will have returned to the office on or before commencement of Phase Three. Reasonable notice will be given as to when an office plans to enter Phase Three. Consideration will be given to individual colleague situations and assessments made concerning reasonable accommodations.
- Vulnerable employees may return to the office but practice social distancing as outlined below, avoid non-essential business travel and continue with other precautionary measures.

Federal Guidelines and Standards

Our plan follows the Centers for Disease Control and Prevention (CDC) guidelines and Federal OSHA standards related to COVID-19 and addresses:

- prompt identification and isolation of sick persons;
- hygiene and respiratory etiquette;
- engineering and administrative controls for social distancing;
- housekeeping – cleaning, disinfecting and decontamination;
- communications and training that will be provided to managers and employees; and
- management and supervision necessary to ensure effective implementation of the plan.

Please note, our policies and procedures specific to the above CDC and OSHA guidelines and standards are outlined below and require 100% compliance from all CAPTRUST employees.

Prompt Identification and Isolation of Sick Persons

The following policies and procedures are being implemented to assess employees' health status prior to entering the workplace and for employees to report when they are sick or experiencing symptoms. During all phases:

You are encouraged to self-monitor for signs and symptoms of COVID-19. The most recent signs and symptoms of COVID-19 can be found [here](#).

If you are sick or experiencing the signs or symptoms of COVID-19 **do not** enter the workplace.

If you have been exposed to a person with COVID-19 you are **not allowed** to enter the workplace until cleared by HR.

Managers are required to document the following situations using the form referenced in Appendix C and send to HR or on-line at the COVID-19 intranet site:

- If an employee or visitor has a confirmed or suspected case of COVID-19, you should immediately notify your manager so we can implement our workforce contact tracing procedures. This means the affected employee's manager and HR rep will use their best efforts to identify all co-workers, clients and visitors with whom the affected employee or visitor was in close contact (within 6 feet for more than 10 minutes according to public health officials) during two days before symptoms first began and notify them of the potential exposure.
- If you begin to experience signs and symptoms of COVID-19 while at the workplace and you are healthy enough to vacate the premises, please do so. Please take additional precautions by wearing a face covering and limit contact with people and surfaces. Please notify your manager as soon as possible after you have self-isolated.
- If you are not having a medical emergency and are not healthy enough to vacate the premises, please find a private space (i.e., single office, wellness room) and call 911 and then notify your manager.

- CAPTRUST requires each employee to take their temperature prior to arriving at the workplace each day. If you are scheduled to come into the workplace and have a fever, as referenced by a reading higher than 100.4 degrees Fahrenheit, you are not to enter the workplace. Please contact your manager to advise next steps.

Generally, employees who have been potentially exposed or exposed will be required to self-quarantine for up to 14 days.

If warranted or mandated by government guidelines, we will conduct temperature checks and other health screenings of employees and visitors before allowing access to any of our offices using a qualified third-party service provider, where possible and economically feasible. Non-invasive thermometers are being distributed to each office.

Hygiene and Respiratory Etiquette

Basic infection prevention measures have been implemented in our workplaces. Employees are instructed to wash their hands for at least 20 seconds with soap and warm water frequently throughout the day, but especially at the beginning and end of their shift, prior to any mealtimes and after using the restroom.

All visitors to the office will be required to wash their hands prior to or immediately upon entering the office. Some of our workplaces may have hand-sanitizer dispensers (that use sanitizers of greater than 60% alcohol) that can be used for hand hygiene in place of soap and water.

Employees and visitors are being instructed to cover their mouth and nose with their sleeve or a tissue when coughing or sneezing; and to avoid touching their face, in particular their mouth, nose and eyes. They should dispose of tissues in the trash and wash or sanitize their hands immediately afterward.

Respiratory etiquette will be demonstrated on posters and supported by making tissues and trash receptacles available to all employees and visitors.

Employees may wear appropriate face coverings at any time while at work. Each employee should have access to a face covering to be kept on their person. Upon request, subject to availability, the company will provide employees with a face covering.

During Phases One and Two, employees and visitors are required to wear face coverings when moving about the office in situations where social distancing is not possible (i.e. when passing within 6ft of someone).

Engineering and Administrative Controls for Social Distancing

Social distancing is being implemented in the workplace through the following engineering and administrative controls. Until further notice:

To the extent possible, all employees and guests should maintain appropriate social distancing of at least 6 feet. In areas where social distancing is difficult (lobby, elevator, bathrooms, office common areas, etc.) face coverings should be worn.

Employees must practice social distancing in common areas, such as lobbies, breakrooms, restrooms, conference rooms and corridors. Regional office principals and corporate department heads, working with input from Facilities and Human Resources, will have primary responsibility for creating and enforcing social distancing practices tailored for their spaces. There is no one-size-fits-all as the most important criteria is to implement whatever steps would be reasonably effective in reducing the spread of the virus. Please be patient as these practices will undoubtedly evolve over time.

Employees must follow these practices for all meetings:

- Limit in-person participants to only those essential to the business purpose
- Include call-in or Microsoft Teams information so invitees can participate remotely, whether from their office or from home, as to not exclude any employees who would benefit from participating
- Host the meeting in the largest possible space so that employees may practice social distancing (i.e., at least 6 feet away from each other). Where social distancing is not achievable, face coverings should be worn.
- Wash your hands and wipe down your area with an anti-virus cleaner after attending any meeting in person

Employees and visitors are prohibited from using others' phones, computer equipment, desks, cubicles, workstations, offices or other equipment without prior approval.

Barriers, floor marking and/or signage for receptionist desks will be installed where appropriate.

Please click [here](#) to review additional state and local rules and building procedures at CAPTRUST offices or visit the Coronavirus intranet site.

Housekeeping

Regular housekeeping practices will be implemented, including routine cleaning and disinfecting of work surfaces, equipment, and areas in the work environment, including restrooms, break rooms, lunchrooms and meeting rooms.

Frequent cleaning and disinfecting will be conducted in high-touch areas, such as, controls, door handles, elevator panels, railings, copy machines, etc.

Employees will be responsible for cleaning their own work areas. Desks, keyboards, mice and phones should be sanitized daily. To aid the cleaning process, employees are to remove all papers from their desk and/or work area and follow the Clean Desk procedure outlined in the Employee Handbook.

Assuming CAPTRUST is aware, if someone who has been in our workplace is suspected of contracting COVID-19 or tests positive for COVID-19, their work area and any area they may have frequented will be thoroughly cleaned and disinfected.

Communications and Training

We will continue to refine this program and ease back into the various offices on a case by case basis. Additional communications will be posted on the COVID-19 website and training will be ongoing as new relevant information becomes available.

Management and Supervision

The CAPTRUST Infectious Disease Control team welcomes your comments and suggestions as we refine this plan and work together in this time of uncertainty. The team can be reached at IDCT@captrust.com.

Managers are to monitor how effective the program has been implemented and advise where changes need to be made and make any recommendations to the CAPTRUST Infectious Control team.

If you have questions or concerns about the implementation of this plan, please reach out directly to Tiffany Larew, Manager Employee Relations at 919-870-6822.

Appendix A

Guidance for developing a COVID-19 Workplace Plan

General

www.cdc.gov/coronavirus/2019-nCoV

www.osha.gov

<https://www.whitehouse.gov/openingamerica/>

<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html>

Employees exhibiting signs and symptoms of COVID-19

www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html

<https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

Handwashing

www.cdc.gov/handwashing/when-how-handwashing.html

www.cdc.gov/handwashing

<https://youtu.be/d914EnpU4Fo>

Respiratory etiquette: Cover your cough or sneeze

www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html

www.health.state.mn.us/diseases/coronavirus/prevention.html

www.cdc.gov/healthywater/hygiene/etiquette/coughing_sneezing.html

Social distancing

www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html

Housekeeping

www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html

www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html

www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2

www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html

Training

www.cdc.gov/coronavirus/2019-ncov/community/guidance-small-business.html

www.osha.gov/Publications/OSHA3990.pdf

Appendix B

CAPTRUST COVID-19 - EMPLOYEE ACKNOWLEDGMENT

For the safety and protection of you, our colleagues, and our clients, it is imperative that you understand, agree, and fully comply with all safety requirements.

If you do not agree or understand any statement, please do not complete this form and contact your supervisor immediately.

1. I acknowledge and take responsibility for the critical role I play to ensure a safe and healthy workplace.
2. I acknowledge that I have been informed by CAPTRUST on the appropriate cleaning, disinfection, hand hygiene, and respiratory etiquette.
3. I understand that I must comply with all CAPTRUST safety policies and procedures (including, but not limited to, daily checking my temperature before arriving, proper social distancing, and use of face coverings where necessary), which are subject to change based on new and evolving information
4. I acknowledge and understand that I am prohibited from coming to work if I have **ANY** of the following new or worsening symptoms:

- Sore throat
- Cough
- Feeling feverish or temperature of 100.4 degrees Fahrenheit or higher
- Shortness of breath
- Difficulty breathing
- Chills or repeated shaking with chills
- Loss of taste or smell
- Known close contact with a person who is lab confirmed to have COVID-19
- Headache, muscle pain, diarrhea
- Any additional symptoms of COVID-19 which can be found:
<https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

5. I agree that I will notify my supervisor if I have had any symptoms listed above in item #4 and have been in the workplace during the last 14 days.
6. I will immediately notify my supervisor if I become aware of any violations of CAPTRUST's safety policies and procedures.
7. I acknowledge and understand that it is my responsibility to stay informed and take actions based on common sense and wise judgment.
8. I have been provided the opportunity to ask questions prior to signing this acknowledgment.

By signing below, I am acknowledging that I have carefully read and reviewed all statements contained in this acknowledgment and I understand the statements and my obligations contained in this acknowledgement.

Name: _____ **Signature:** _____

Date: _____

Appendix C

REPORT FOR EMPLOYEES AND VISITORS DISPLAYING COVID-19 SYMPTOMS

Date:

Name:

Type:

- ☐ Visitor
- ☐ Employee
- ☐ Contractor

Job Title:

Worksite:

Location of Isolation:

Address:

Symptoms:

- ☐ Sore throat
- ☐ Cough
- ☐ Feeling feverish or temperature of 100.4 degrees Fahrenheit
- ☐ Shortness of breath
- ☐ Difficulty breathing
- ☐ Chills or repeated shaking with chills
- ☐ Loss of taste or smell
- ☐ Known close contact with a person who is lab confirmed to have COVID-19
- ☐ Headache, muscle pain, diarrhea

Time of fever on-set:

Time of isolation:

Where referred to:

Notes:

DETAILS OF REPORTER

Name:

Job title:

Telephone Number: