

Regulatory, Compliance and HSE **PROGRAM**

Pandemic Response Plan

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1. Purpose

This policy is intended for TenacIT, LLC ("TenacIT" or "Company") as a company that does not meet the definition of critical infrastructure as defined by the federal government. This type of organization may be requested by public health officials to close their offices to non-essential personnel or completely during a worst-case scenario pandemic to limit the spread of the disease. Many companies would run out of cash and be forced to go out of business after several weeks of everyone not working. Therefore, developing a response plan in advance that addresses who can work remotely, how they will work and identifies what other issues may be faced will help the organization survive at a time when most people will be concerned about themselves and their families.

Disasters typically happen in one geographic area. A hurricane or earthquake can cause massive damage in one area, yet the worst damage is usually contained within a few hundred miles. A global pandemic, such as the 1918 influenza outbreak which infected 1/3 of the world's population, cannot be dealt with by failing over to a backup data center. Therefore, additional planning steps for IT architecture, situational awareness, employee training and other preparations are required.

This document directs planning, preparation and exercises for pandemic disease outbreak over and above the normal business continuity and disaster recovery planning process. The objective is to address the reality that pandemic events can create personnel and technology issues outside the scope of the traditional DR/BCP planning process as potentially 25% or more of the workforce may be unable to come to work for health or personal reasons.

2. Scope

The planning process will include personnel involved in the business continuity and disaster recovery process, enterprise architects and senior management of TenacIT. TenacIT has established a Pandemic Preparedness Plan to help ensure the safety of all persons on TenacIT premises when there is a threat of influenza or other pandemic that causes a serious widespread illness. The plan has two main strategies: reduce transmission of the pandemic virus within business facilities; and maintain essential services if containment is not possible.

The plan communicates responsibilities of TenacIT employees, contractors and managers prior to and during a serious infectious outbreak occurrence, identifies and defines responsibilities of the Pandemic Response Team, and provides processes and protocols to be followed through the five stages of a pandemic.

This plan satisfies the requirements of P.U.C. SUBST. R. §25.53(c) (4) (A)-(C), that TenacIT maintains a Pandemic Preparedness Plan to ensure continuous and adequate service during a pandemic.

3. Employee and Contractor Responsibilities

Employees and Contractors must follow TenacIT Pandemic Directives as they are communicated.

Pandemic Directives can be communicated before or at declaration of a pandemic depending on its evolution. (Appendix A – Example)

While very little can be done to prevent getting a new virus, workers are encouraged to obtain appropriate immunizations to help avoid diseases in general. TenacIT will be granting time off work to obtain available vaccines

4. Pandemic Response Team Responsibilities

The Pandemic Response Team will be comprised of members of HR, Facilities, Security, Communications, Executive Team and Business Continuity. The Pandemic Response Team responsibilities and actions are listed in Mobilization Procedures. A Pandemic Response Coordinator is identified for each location. The Pandemic Plan Coordinator and HR Pandemic Response Coordinators are a manager's contact point for questions and notification of affected staff in their department.



5. Plan Activation

The Pandemic Plan Coordinator is responsible for updating the Company and will work with the Disaster Management Team to activate Mobilization Procedures. Mobilization Procedures will be activated when one or more of the following criteria are met:

• The World Health Organization (WHO) declares a pandemic when it is in increased and sustained transmission in the general population.

• Essential services are impacted by influenza flu or other pandemic either due to employee absenteeism, lack of supplies, or other reasons.

• Determination from employee self-reporting or management reporting.



6. Mobilization Procedures

Pandemic Response Team responsibilities and actions are listed for the Inter-Pandemic, Pre-Pandemic (Alert phase), Pandemic and Post Pandemic (Transition) Periods.

- A = Actor, person responsible for action
- C = Contact, may provide information or precipitate action
- P = Active participant in action

6.1 Inter-Pandemic Period

Step	Action	Responsibility				
		Pandemic Plan Coordinator	HR Manager / Staff	Security Manager / Staff	Executive Management Team	Business Continuity Coordinator
1 Monitor inter-pandemic surveillance on WHO and CDC		А				
2	Communicate current and potential activity to Pandemic Response Team	А	С	С		
3	Maintain pandemic supplies	А				
4	Review Pandemic Response Plan	А			А	
5	Annually Test Pandemic Response Plan and Business Continuity Plan	А			Р	Р



6.2 Pre-Pandemic Period (Alert phase)

Step	Action			Responsibility		
		Pandemic Plan Coordinator	HR Manager / Staff	Security Manager / Staff	Executive Management Team	Business Continuity Coordinator
1	Monitor pre-pandemic surveillance on WHO, CDC, Texas DSHS, local news websites	А				
2	Communicate current and potential activity to Pandemic Response Team, Business Continuity Coordinator, employees, customers	А	Ρ			
3	Maintain pandemic supplies	А		Р		
4	Anticipate employee fear and anxiety, rumors, and misinformation and plan communications accordingly	А	А			
5	Activate Pandemic notification process to manage cases at work / customers	А	Р			
6	Track employee exposures	А	Р			
7	Activate workplace cleaning	A	Р	С		
8	Reduce Non-Critical travel and Activate tracking overseas travel if applicable	А	Р		Р	
9	Communicate to Executive Team and Business Continuity Coordinator potential for pandemic alert imminent	А	Р	С	С	С



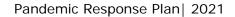
6.3 Pandemic Period

Step	Action	Responsibility				
		Pandemic Plan Coordinator	HR Manager / Staff	Security Manager / Staff	Executive Management Team	Business Continuity Coordinator
1	Activate pandemic preparedness plan	А	А	Р	Р	Р
2	Monitor pre-pandemic surveillance on WHO, CDC, Texas DSHS, local news websites	А				
3	Communicate activation of plan in directive to TenacIT employees and customers	А	А	С	С	С
4	Maintain pandemic supplies	А				
5	Continue notification process to manage cases at work	А	Р	С	С	
6	Track employee exposures	А	Р	С	С	
7	Continue workplace cleaning and restrict access to "open" workspaces	А	Р	С		
8	Eliminate ALL Non-Critical travel and Require Mandatory Employee Quarantine if employee travels for any reason	А			Ρ	
9	Monitor CDC and Texas DSHS for anti- viral medication information and development of vaccine	А				
10	Activate social distancing protocol and require employees to work remotely	А	А	С	С	С



6.4 Post-Pandemic Period (Transition phase)

Step Action		Responsibility					
		Pandemic Plan Coordinator	HR Manager / Staff	Security Manager / Staff	Executive Management Team	Business Continuity Coordinator	
1	Monitor pre-pandemic surveillance on WHO, CDC, Texas DSHS, local news websites	A	С				
2	De-activate pandemic plan	A	А	Р	Р	Р	
3	Communicate de-activate plan in directive to TenacIT employees	А	Р				
4	Restock/Maintain pandemic supplies	A		Р			
5	Anticipate employee fear and anxiety, rumors, and misinformation and plan communications accordingly	А	А				
6	Discontinue notification process	A	Р				
7	Return to normal workplace cleaning	A	Р	С			
8	Discontinue tracking overseas travel	А	Р		Р		
9	De-activate social distancing protocol if applicable	А	Р	Р	Р	Р	
10	Document Lessons Learned and update Pandemic Response Plan	А			А	Р	





7. Monitoring

TenacIT's primary source of pandemic information is https://www.cdc.gov/. The TenacIT Pandemic Plan Coordinator will monitor related information that may impact TenacIT.

8. Health Response Communications

HR and Pandemic Plan Coordinator will coordinate communications made via email, SMS text, mass communications tool, and telephone where possible. TenacIT directives and instructions will be provided by HR and Pandemic Plan Coordinator

9. Containment Activities

Reducing risk of infected persons entering the site

A primary Pandemic Response Coordinator has been identified for each of TenacIT's locations and will operate per plan under the guidance of the TenacIT Pandemic Plan Coordinator. The Pandemic Plan Coordinator will ensure that employee communications include pandemic fact sheet and information on key general infection control notices and social distancing.

10. Social Distancing

Social distancing refers to strategies to reduce the frequency of contact between people. Social distancing strategies may include:

- Avoid meeting people face to face use the telephone, video conferencing and the internet to conduct business as much as possible even when participants are in the same building.
- Avoid any unnecessary travel and cancel or postpone non-essential meetings / gatherings / workshops / training sessions.
- If possible, arrange for employees to work from home or work flex hours to maintain healthy staff and avoid cross infection, and rework shift changes to allow for intervals between shifts so that the work area can be thoroughly cleaned and ventilated.
- Avoid public transport: walk, cycle, drive a car or go early or late to avoid rush hour crowding on public transportation.
- Bring lunch and eat at desk or away from others (avoid break room and crowded restaurants). Introduce staggered lunchtimes so numbers of people in the break rooms are reduced.

If a face-to-face meeting with people is unavoidable, minimize the meeting time, choose a large meeting room and sit at least 6 feet away from each other if possible; avoid shaking hands or any personal contact. Encourage staff to practice social distancing away from the office.

11. Cleaning

Building Management will step up office cleaning during the pandemic period until such a time where the office closes due to safety concerns. Employees should clean and disinfect telephone sets and any other surfaces that they operate prior to use regardless of when the last cleaning took pace.

Building Maintenance and Custodian Staff will apply anti-bacterial solutions to all common areas, counters, railings, washbasins, toilet bowls, urinals, and showers daily. Staff may use approved cleaning products made available in the workrooms/copy rooms. Other cleaning concerns or requests should be submitted to the HR.

12. Managing Fear

The Pandemic Plan Coordinator will work with HR to manage this in the following ways:

- Communicate the possibility of a pandemic to all staff when warranted.
- Maintain this plan and provide communications to staff as necessary.
- Provide clear, timely and proactive communications to staff when things are changing.
- Provide clear communications on how the Business is handling the situation if a pandemic does occur.
- Provide backup assistance for counseling staff through the EAP service.



13. Managing Cases at Work

The Pandemic Plan Coordinator will access the latest US Department of Health and Human Services (DHHS) advice regarding managing staff that become ill and modify the process outlined below as appropriate. This information will then be provided to the Pandemic Response Team.

The Pandemic Plan Coordinator will send out awareness emails to staff regarding what to do if people get sick at work. If a person feels ill, or if someone observes that another person is exhibiting symptoms at work, they should notify their manager. Managers should contact the Pandemic Plan Coordinator by telephone if at all possible.

Using the screening flowchart (Appendix B), the Pandemic Plan Coordinator:

- Should manage the process over the phone, if possible.
- If the employee leaves the office without first contacting the Pandemic Plan Coordinator, or calls in sick with flu-like symptoms, they should be treated as a "suspect case." The Manager and/or Employee should complete and submit a Flu Notification Form located on the Environmental Health and Safety SharePoint site for each case. The Contact List on the form should include details of any staff and/or visitors the person has been in contact with. The information will permit HR and the Pandemic Plan Coordinator to monitor staff whereabouts and well-being during the pandemic.
- Pandemic supplies are located at each facility. See Appendix C Pandemic Supplies Inventory and Locations.

Contact Management – The Pandemic Plan Coordinator will identify contacts (once an employee is suspected to be infected); advise contacts that they have been in contact with a person suspected of being exposed; ask contacts to monitor their health and practice social distancing in the workplace by reducing contact with others for 7 days. They will be able to remain at work unless fever develops. The suspect case's work station should be cleaned and disinfected, as indicated in the section on workplace cleaning (Cleaning 11,0).

Return to work of a confirmed case: A Fitness for Duty form will be required to be submitted to HR if it is your own medical. The Manager will also advise staff member on any special instructions pertaining to any TenacIT Directives (US DHHS will have advice on this once the characteristics of a pandemic are known). This will facilitate treatment, contact tracing, etc., if they become ill.

14. Travel

14.1 Travel Advisories

The Pandemic Plan Coordinator receives travel advisories from the US DHHS at <u>https://www.cdc.gov/</u> and will communicate to staff, as information becomes available, to avoid the potential for travelers to be stranded overseas if flights, etc., are cancelled to minimize risk of spread, or to avoid being quarantined through the US DHHS quarantine procedures.

14.2 Preventing Travel to Infected Areas

TenacIT's Pandemic Plan Coordinator will notify TenacIT's Business Continuity Coordinator, Human Resources, and Security of locations to be blocked for business travel.

14.3 Managing Those Already in Infected Areas

Per mobilization procedures, TenacIT's Pandemic Plan Coordinator will work with HR and Security to determine when to activate the travel log for employees and visitors. The Pandemic Plan Coordinator will work with HR to determine who is currently in infected areas and will provide information regarding infection control precautions as well as work with HR to discuss those travelling home from infected areas.

14.4 Those Recently Returned from Infected Areas

Communications will be sent by the Pandemic Plan Coordinator regarding the need to be vigilant regarding self-checking for symptoms and to seek medical advice by phone immediately if symptoms occur. The traveler should report their travel history to the treating doctor or nurse.

14.5 Travel Advice

The Pandemic Plan Coordinator will be responsible for the health content of travel communication. The health content of Travel Communication will be taken from the US DHHS web site (https://www.cdc.gov/).



14.6 Treatment Anti-viral medication

The US DHHS will provide recommendations for the use of anti-viral medication and the Pandemic Plan Coordinator should check the US DHHS website for the latest information on the use of anti-viral medications and communicate to TenacIT staff as necessary.

14.7 Vaccine

Vaccine development cannot commence until the pandemic virus has been isolated. • It may take 3-6 months or longer after the declaration of a pandemic by WHO before a vaccine is generally available for use by TenacIT employees.

15. Maintenance of Essential Business Activities

Important Note: The Disaster Management Team members identified in TenacIT's Business Continuity Plan are responsible for the identification of core business processes, people, and skills that must be maintained in the event of a pandemic.

15.1 Identification Of Mission Critical Business Processes

The minimum staffing levels to run mission critical business processes under pandemic conditions would be similar to the Business Continuity Scenario – the complete loss of all facilities. Based on the severity and nature of the pandemic event, the Disaster Management Team may decide it is appropriate to work from home to ensure their continued availability and capability to manage the event. Alternate sources of skilled people may be utilized in the event of a prolonged pandemic. TenacIT will consider the use of volunteers, staff from other ISOs (Independent System Operators), vendors, contractors and consultants. Decisions to execute any aspect of the Business Continuity Plan related to a pandemic event will be made by the Disaster Management Team in concert with TenacIT's Executive Management Team.

16. Communications

Communications associated with pandemic events will be managed by the Pandemic Plan Coordinator, Human Resources and/or the Crisis Communications Team which is part of the TenacIT Business Continuity Disaster Management Team. The Crisis Communications Team is structured to provide the necessary communications to TenacIT employees and contractors, market participants, the media and governmental agencies.

17. Knowledge Management

Pandemic readiness documentation will be located and maintained on the TenacIT Strategic Planning Intranet site. A link to this document is also available on the Environmental Health and Safety SharePoint site.

18. Employee Compensation

TenacIT will make every effort to maintain pre-pandemic employee compensation levels throughout the Pandemic, but it must be understood that if project work decreases beyond a point where revenues are less than expenses then a possible furlough may be instituted to maintain business survival. Before that occurs, all non-critical expenses will be eliminated and temporary pay reductions will be put in place.

Fortunately, TenacIT is aptly structured to maintain 100% productivity, regardless of work location and all work can be performed remotely.

19. Identifying Symptoms of Exposure

An employee training process covering personal protection prior to Activating the Pandemic Plan should include:

- Identifying symptoms of exposure
- The concept of disease clusters in day cares, schools or other gathering places
- Basic prevention limiting contact closer than 6 feet, cover your cough, hand washing
- When to stay home
- Avoiding travel to areas with high infection rates



20. "High Risk" Employees and Contractors

A process for the identification of employees with first responders or medical personnel in their household. These people, along with single parents, and parents who have children with medical susceptibility, have a higher likelihood of unavailability due to illness or childcare issues.

Employees should be encouraged to contact HR and self identify themselves as having a higher risk. Key personnel for each critical business function should also be deemed high risk. Each employee deemed "High Risk" should have plans put in place to transition their duties to others in the event they become ill.

21. Pandemic Supplies

A list of supplies to be kept on hand or pre-contracted for supply, such as face masks, hand sanitizer, fuel, food and water will be created and maintained by the Pandemic Plan Coordinator. As each facility and each pandemic can vary in it's requirements, general supplies shall be maintained and distributed upon activation of the Pandemic Plan.

22. Policy Compliance

- Compliance Measurement The Infosec team will verify compliance to this policy through various methods, including but not limited to, periodic walk-thrus, video monitoring, business tool reports, internal and external audits, and feedback to the policy owner.
- Exceptions Any exception to the policy must be approved by the Infosec team in advance.
- Non-Compliance An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

23. Definitions and Terms

Pandemic - A pandemic is a disease epidemic that has spread across a large region, for instance multiple continents, or worldwide. A widespread endemic disease that is stable in terms of how many people are getting sick from it is not a pandemic. Further, flu pandemics generally exclude recurrences of seasonal flu.



24. Appendix A

Pandemic Directive Example

TenacIT plays a critical role in supporting our community and state infrastructure. There is no room for complacency when it comes to dealing with the H1N1 Swine Flu virus.

TenacIT Pandemic Directive:

- 1) Employees and Contractors who travel by air in the U.S. and Overseas should closely monitor their health for 7 days after returning from their trip. If you become ill with flu-like symptoms, stay home and seek medical attention.
- 2) As a precautionary step, TenacIT will collect information from Employees and Contractors that have traveled outside of the United States. Please be assured that these are precautionary steps with respect to the H1N1 situation. Use the Travel Log Form (located on the Environmental Health and Safety SharePoint site) to submit travel information. If you do not have access to the on-line form, please complete a travel log form at any one of the Security Control Stations.
- 3) All Visitors will be asked if they have traveled outside the United States within the last 3 weeks and if so are required to complete an International Travel Visitors Log.
- 4) Sick Employee or Contractor With flu-like symptoms including fever or chills and cough or sore throat.
- Other symptoms can include runny nose, body aches, headache, tiredness, diarrhea, or vomiting.
 - a) Any Employee or Contractor should be alert to any signs of fever and any other signs of flu-like illness before reporting to work each day. Notify your TenacIT manager and stay home if ill. An Employee/Contractor who is ill should not travel while ill. The Employee/Contractor with flu-like symptoms and fever should stay home until at least 24 hours after they no longer have a fever (100 degrees Fahrenheit or 38 degrees Celsius) or signs of a fever (have chills, feel very warm, have a flushed appearance, or are sweating). This should be determined without the use of fever reducing medications (any medicine that contains ibuprofen or acetaminophen).
 - b) Any Employee or Contractor who become ill with symptoms of a flu-like illness during the workday should notify their TenacIT Manager. The individual will be:
 - i) Separated from other workers and asked to go home promptly.
 - ii) If the individual cannot leave promptly and if the individual with flu-like symptoms can tolerate it, they will be given a surgical mask to wear while they wait to go home if they cannot be placed in an area away from others.
- 5) Sick member in your household
 - a) An Employee/Contractor who is well but who have an ill family member at home with flu can go to work as usual. These individuals should monitor their health every day and notify their Manager and stay home if they become ill.
 - b) An Employee/Contractor who needs to stay home to care for an ill family member can work an alternative work schedule with their Manager's approval if the position allows it. Options include a telecommuting work schedule or flexible hours.
- 6) Casual contact with a sick individual Any Employee or Contractor who has come in casual contact, including conversation or physical contact, with a sick individual should monitor themselves for symptoms of flu-like illness and stay home if they become sick.
- 7) If schools are closed in our area and you need to stay home with your children, Managers may be able to accommodate Employees by allowing work from home or flexible work times if the position allows. In the event that work cannot be done remotely or at flexible hours, Employees may be required to utilize sick or vacation hours. Please work with your Manager and HR.
- 8) If you have any questions please discuss with your Manager or HR.

Note: There are no restrictions on business or non-essential travel due to the H1N1 flu virus at this time.

Remember: The rule of thumb for flu pandemics is that they will infect one-third to one-half the population; not all at once, but over a span of two years. The typical pattern is intense local epidemics that last 6–8 weeks and then move on, often returning two or three times before the pandemic is over. Before winter arrives, U.S. Officials hope to have a vaccine that they can at least offer to people in high-risk groups.

Being prepared is Key:

- Stay informed by visiting www.flu.gov and the Environmental Health and Safety SharePoint Site
- Review TenacIT Pandemic Plan Overview
- Take action to prepare using the Pandemic Planning Checklist for Individuals and Families



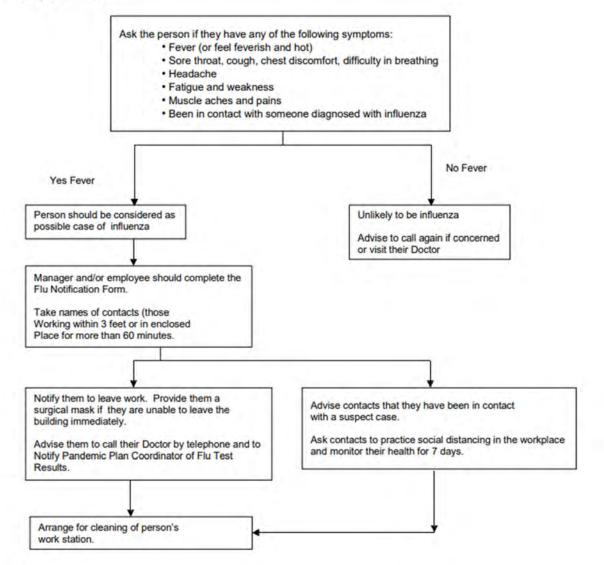
25. Appendix B

Screening Checklist Detection and Management of Suspected Pandemic Cases

PROCESS

- 1) The Pandemic Plan Coordinator receives a call from a person or their manager suspecting they may have an influenza case
- 2) Do not visit the person if this can be avoided manage the process over the telephone
- 3) Follow the flowchart below:

Screening Flowchart





26. Appendix C

Pandemic Supplies Inventory and Locations

Item #	Cabinet Contents	Area 1	Area 2		
1	Safety Glasses - 1 pair				
2	Poster 'Stop - Do you feel sick' Laminated				
3	Thermometers - 3 1/2" disposal single use				
4	Gloves - Ndex Nitrile, one box, size large				
5	Hand Sanitizer - 2-12 oz. Purell pump bottles				
6	Dust Masks - Wilson light duty - 2 boxes/50 ea				
7	N95 Particulate Respirators - Alpha Protech 1 box/35 ea.				
8	3M Particulate Respirators no Latex, #860 1 box/20 ea				
9	Flat Duck Bill respirators M9410-FM20-N95 1 box/20 ea				
10	Clorox Disinfecting Wipes - 2 containers/35 wipes ea.				



27. Revision History

2020/03/12	C. E. Wells	Document Creation