



COVID-19 Preparedness and Response Plan

STEVE'S EUROPEAN AUTOMOTIVE, INC.

In accordance with Executive Order 2020-59, Steve's European Automotive, Inc. enacts this COVID-19 Preparedness and Response Plan.

With this plan, our goal is to protect our team members and clients by instituting policies in accordance with the CDC and Occupational Health and Safety Administration. We will continue to monitor local, state, and federal health officials and implement workplace modifications to this plan when appropriate.

Employees or clients with questions are encouraged to contact our on-site COVID-19 Supervisor via phone at 248-674-2770 ext. 234 or email at jpearson@steveseuropeanauto.com. You may also contact our off-site COVID-19 Resource Manager at nwest@steveseuropeanauto.com.

1. Classifying Worker Exposure to SARS-COV2

In accordance with the OSHA Guidance on Preparing Workplaces for COVID-19, our team members are classified as Low Exposure Risk. The majority of our team members do not come in contact with the public and are able to work in large personal ventilated workspaces. The few team members that do come in contact with the public, can carry out normal business tasks while in accordance with social distancing guidelines set by the CDC. We do have several team members who are in a higher risk age demographic. These team members do not come in contact with the public and work in large personal workspaces.

2. Implementation of Infection Prevention Measures

Steve's European Automotive, Inc. will first implement core infection control practices including:

- a. Sanitation and Social Distancing
 - i. Promoting frequent and thorough hand washing
 1. Providing team members and clients hand washing stations
 2. Setting up hand sanitizing locations throughout the shop
 - ii. Encouraging team members to stay home if they are sick
 - iii. Prohibiting handshaking
 - iv. Encouraging respiratory etiquette, including covering coughs and sneezes
 - v. Provide clients and team members with tissues and touch free trash receptacles

- vi. Designating personal workstations for each team member that comply with social distancing recommendations
- vii. Supplying all team members with face masks, gloves, and disinfectant
- viii. Encouraging all clients to wear masks if coming into the building
 - 1. Offering masks to clients that do not have such protection
- ix. Discouraging team members from using other team members' phones, desks, offices, or other work tools and equipment, when possible.
- x. Maintaining routine cleaning and disinfecting of surfaces, equipment, tools and other elements of the work environment using Environmental Protection Agency (EPA)-approved disinfectants in accordance with the CDC
- xi. Requiring team members to adhere to 6ft. social distancing guidelines designated by the CDC and if this is not possible for certain situations then proper PPE must be worn

3. Prompt Identification and Isolation of Sick Team Members

Steve's European Automotive, Inc. is implementing important procedures for the identification and isolation of potentially sick team members including:

- a. Self-Monitoring for COVID-19 Symptoms

The following employees should not report to work and, upon notification to Company, will be removed from the regular work schedule:

- i. Employees who display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis
- ii. Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis
- iii. Employees who, in the last 14 days, have had close contact with and/or live with any person displaying COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting

- b. Daily Screenings for Identification of Sick Team Members
 - i. Daily screening questionnaires are required of all team members before they start their shift via our Team Website
 - ii. Training for team members in how to report sickness or symptoms
 - iii. Training of a COVID-19 Supervisor who will monitor daily symptom questionnaires and enact policy to isolate team members who fail said questionnaire
 - iv. Screening questions include:
 - 1. Do you have the following symptoms: fever of 100.4 or higher, cough, or shortness of breath?
 - 2. Do you have at least 2 of the following: chills, muscle pain, headache, loss of taste or smell, diarrhea, or extreme fatigue?
 - 3. Have you traveled internationally or outside of Michigan in the last 14 days?
 - 4. Have you had any close contact in the last 14 days with someone with a diagnosis of COVID-19?

- c. Isolation of Potentially Sick Team Members
 - i. Implementing policy to immediately isolate team members who show signs symptoms of COVID-19 and require them to return home
 - ii. Designating the IT office, an area with closable doors that will serve as an isolation room until potentially sick team members can be removed from the shop
 - iii. Taking steps to limit spread of the respiratory secretions of a team member or client who may have COVID-19
 - 1. Providing face masks for team members and clients
 - iv. Asking employees that show symptoms of COVID-19 to be tested at a local testing facility

- d. Return to Work Requirements

Employees who were themselves diagnosed with COVID-19 may only return to work upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the non-test-based strategy.

- i. The test-based strategy is preferred but relies upon the availability of testing supplies and laboratory capacity. Under this strategy, employees may discontinue isolation and return to work upon achieving the following conditions:
 - 1. Resolution of fever without the use of fever-reducing medications; and
 - 2. Improvement in respiratory symptoms (e.g., cough, shortness of breath); and
 - 3. Negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from two consecutive nasopharyngeal swab specimens collected at least 24 hours apart.
- ii. Under the non-test-based strategy, employees may discontinue isolation and return to work upon achieving the following conditions:
 - 1. At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications; and
 - 2. Improvement in respiratory symptoms (e.g., cough, shortness of breath); and
 - 3. At least 7 days have passed since symptoms first appeared.
- iii. Employees who came into close contact with, or live with, an individual with a confirmed diagnosis or symptoms may return to work after either 14 days have passed since the last close contact with the diagnosed/symptomatic individual, or the diagnosed/symptomatic individual receives a negative COVID-19 test.

4. Developing, Implementing, and Communicating Workplace Flexibilities and Protections

- a. Actively requiring sick team members to stay home
- b. Ensuring our sick leave policy is flexible and consistent with public health guidance and sharing these policies with all team members on our team website
- c. Never requiring a healthcare provider's note for team members who are sick with acute respiratory illness to validate their illness or to return to work
- d. Enacting flexible policy that permit team members to stay home to care for a sick family member
- e. Providing adequate, usable, and appropriate training, education, and informational material about business-essential job functions and worker health and safety, including
 - i. proper hygiene practices
 - ii. workplace controls (including PPE)

- f. Working with insurance companies (e.g., those providing employee health benefits) and state and local health agencies to provide information to workers and customers about medical care in the event of a COVID-19 outbreak
- g. Creating a space on our team website to relay all necessary information and resources
- h. Unemployment Compensation Benefits
 - i. Under Executive Order 2020-57, and the federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.
 - ii. Employees who are unable to report to work for reasons related to COVID-19 are referred to Human Resources for information on unemployment compensation benefits. Such reasons include the following:
 1. Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised.
 2. Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath).
 3. Having close contact in the last 14 days with a confirmed COVID-19 diagnosis.
- i. Executive Order 2020-36

Employees who require leave beyond the EPSLA because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis/symptoms, may be eligible for unpaid leave under Executive Order 2020-36 until permitted thereunder to return to work.

- j. FMLA and ADA

Employees may be entitled to unpaid leave under the Family and Medical Leave Act (“FMLA”) if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where “complications arise.”

Steve’s European Automotive, Inc. is also mindful of its obligations under the Americans with Disabilities Act (“ADA”). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then Steve’s European

Automotive, Inc. engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.

5. Implementation of Workplace Controls

We will be implementing various controls to generate effective protection measures, including:

- a. Engineering Controls
 - i. Installing high-efficiency air filters throughout the shop
 - ii. Routinely opening large garage doors to allow for more outside air flow
 - iii. Increasing ventilation rates in the work environment
 - iv. Installing plexiglass barriers surrounding our team members that meet clients

- b. Administrative Controls
 - i. Encouraging sick team members to stay at home
 - ii. Minimizing contact among team members by encouraging members to stay in only their workspace if possible
 - iii. Minimizing contact among team members by holding all meetings virtually via Microsoft Teams
 - iv. Encouraging clients to meet with team members also via Microsoft Teams
 - v. Offering No-Contact Service to all clients
 1. Offering Vehicle Drop-Off that eliminates the need for face-to-face contact with team members and clients
 - vi. Arranging for team members to work remotely if possible
 - vii. Establishing staggered work shifts for team members that are most at risk due to age, health, or other conditions
 - viii. Allowing for electronic pay for our clients – online or over the phone
 - ix. Developing emergency communications plans on our company hub site, including a forum for answering workers' concerns
 - x. Providing workers with up-to-date education and training on COVID-19 risk factors and protective behaviors

- xi. Training workers who need to use protecting clothing and equipment how to put it on, use/wear it, and take it off correctly, including in the context of their current and potential duties.
- xii. Canceling all upcoming group events

c. Safe Work Practices

- i. Providing resources and a work environment that promotes personal hygiene including providing tissues, no-touch trash cans, hand soap, alcohol-based hand sanitizer disinfectants, and disposable paper towels for workers to clean their work surfaces
- ii. Requiring regular hand washing before and after shift, before and after coming into contact with a client's vehicle
- iii. Posting handwashing signs throughout the shop

d. Personal Protective Equipment (PPE)

- i. Providing PPE for all our employees including
 1. Nitrile gloves of all sizes
 2. Three layered cotton face masks
 3. Protective goggles
 4. Hand Sanitizer

6. Plan Updates and Expiration

This Plan responds to the COVID-19 outbreak. As this pandemic progresses, Steve's European Automotive, Inc. will update this Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by Steve's European Automotive, Inc. and in accordance with guidance from local, state, and federal health officials.