

COVID-19 Preparedness and Response Plan – Oasis Hot Tub Gardens

In compliance with Michigan’s Executive Order 2020-59, The Oasis institutes this COVID-19 Preparedness and Response Plan (“Plan”).

The Oasis aims to protect its staff and patrons by enacting all appropriate prevention efforts. We will continue to monitor guidance from local, state, and federal health officials and implement location and Plan modifications where appropriate.

Employees with questions are encouraged to contact their General Manager or Regional Manager via phone and/or email.

1. Prevention Efforts and Workplace Controls

a. Cleanliness and Social Distancing

As a part of the hospitality and service industry, there is minimal work pertaining to The Oasis that can be performed remotely. The Oasis will abide by recommended social distancing and other safety measures as follows:

- Large gatherings are minimized; staff meetings will be held remotely to the extent possible
- Employees are required to maintain physical distance when reporting to work, clocking in, leaving work, and clocking out
- Employees are required to follow social distancing markers on the premises, maintaining 6ft distancing, to the fullest extent possible
- The Oasis may utilize flexible work hours (on-call shifts, etc.), whenever possible, to limit the number of employees simultaneously working on-site)
- Employees’ interactions with the general public are modified to allow for additional physical space between parties
- Non-essential travel is postponed or cancelled

The Oasis provides employees with non-medical grade face coverings. Gloves are available for cleaning staff and are required for any staff with cracked or broken skin.

In addition, The Oasis is instituting the following cleanliness measures:

- Performing routine environmental cleaning and disinfection, especially in common areas
- Providing hand sanitizer in high traffic areas

Employees are expected to minimize COVID-19 exposure by:

- Cleaning work stations and equipment at the beginning and end of each shift

- Maintain Oasis’ high standards for cleaning guest suites, increasing the cleaning frequency of high frequency touch points in suites and throughout the building
- Avoiding, to the fullest extent possible, the use of other employees’ phones, desks, work tools and equipment
- Frequently washing hands with soap and water for at least 20 seconds (throughout the shift and between glove changes
- Utilizing hand sanitizer when soap and water are unavailable
- Avoiding touching their faces with unwashed hands
- Avoiding handshakes or other physical contact
- Avoiding close contact with sick people
- Practicing respiratory etiquette, including covering coughs and sneezes
- Immediately reporting unsafe or unsanitary conditions on Company premises
- Complying with Company’s daily health screening processes
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms
- Complying with self-isolation or quarantine orders

Employees have participated in training regarding knowledge of virus symptoms and proper use of PPE prior to returning to work.

b. Supplemental Measures Upon Notification of Employee’s COVID-19 Diagnosis and/or Symptoms

An employee with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from the worksite.

In response to a confirmed diagnosis or display of COVID-19 symptoms, The Oasis:

- Informs all employees with and near whom the diagnosed/symptomatic employee worked of a potential exposure
- Keeps confidential the identity of the diagnosed/symptomatic employee
- Conducts deep cleaning of the diagnosed/symptomatic employee’s workstation, as well as those common areas potentially infected by the employee

All employees who worked in sustained, close proximity (within 6 ft for a cumulative total of 15 minutes or more over a 24-hour period starting from two days before illness onset or, for asymptomatic patients, two days prior to test specimen collection) to the diagnosed/symptomatic employee are also removed from the worksite for at least 14 days; however, should these exposed employees later develop COVID-19 symptoms and/or receive a confirmed diagnosis, they may not report on-site until all return-to-work requirements are met, defined below.

c. Worker Exposure Classification

Employees’ “worker exposure” is classified as medium risk by the Occupational Safety and Health Administration’s guidance because they frequently and/or closely interact with the general public.

Given this classification, The Oasis provides the following controls in addition to the above-summarized prevention efforts: installing physical barriers at check-in desks, limiting exposure to the general public, and minimizing face-to-face contact. Notices are posted informing guests of the State's requirement that masks be worn in any enclosed public space. Disposable masks are available for guest who enter without one. Notices also inform guests to adhere to social distancing guidelines and not to enter if they are/have recently been sick.

2. Identification and Isolation of Sick and/or Exposed Employees

Risk and exposure determinations are made without regard to employees' protected characteristics, as defined by local, state, and federal law.

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employees' personnel documentation.

a. Employees' Self-Monitoring

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

- 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
- Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis
- 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

Such employees may only resume in-person work upon meeting all return-to-work requirements, defined below.

b. Daily Screenings

To prevent the spread of COVID-19 and reduce the potential risk of exposure, The Oasis screens employees at the beginning of each shift.

Employees are asked the following questions before entering the worksite:

1. Are you currently suffering from any of the following symptoms – fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting?
 - a. Temperature checks are performed with a touchless thermometer.

- b. If yes, employee is sent home, and is advised to self-isolate/self-quarantine at home, until employee is permitted to return to work as defined below.
2. Have you lived with, or had close contact with, someone in the last 14 days diagnosed with or displaying the symptoms of COVID-19?
 - a. If yes, employee is sent home, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the close contact.
3. Have you travelled via airplane internationally in the last 14 days?
 - a. If yes, employee is sent home, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the international travel.

Employees who develop symptoms during their shift must immediately report to their supervisor/shift leader.

c. 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.

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:

- Resolution of fever without the use of fever-reducing medications
- Improvement in symptoms
- 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.

Under the symptom-based strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- At least 1 day (24 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications
- Improvement in symptoms
- At least 10 days have passed since symptoms first appeared.

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.

Employees are typically required to submit a release to return to work from a healthcare provider; given the current stressors on the healthcare system, Company may accept written statements from employees confirming all the factors supporting their release.

3. Workplace Flexibilities and Potential Benefits for Employees Affected by COVID-19

The Oasis is temporarily suspending the adverse effects for *eligible* absences.

In addition, employees may be eligible for paid and unpaid leaves of absence.

Employees may be permitted to utilize available paid time off provided under PTO and Sick policies concurrently with or to supplement any approved leave.

a. FFCRA

Employees may qualify for paid leave under the Families First Coronavirus Response Act (“FFCRA”).

Under the Emergency Paid Sick Leave Act (“EPSLA”), employees may seek up to two weeks (i.e., 10 business days) of paid leave for the following reasons:

1. Subject to a Federal, State, or local quarantine or isolation order related to COVID-19
2. Advised to self-quarantine due to concerns related to COVID-19
3. Experiencing symptoms of COVID-19 and seeking a medical diagnosis
4. Caring for an individual subject to a quarantine or isolation order or advised to self-quarantine due to concerns related to COVID-19
5. Experiencing any other substantially similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretary of the Treasury and the Secretary of Labor. (Please note, the Secretary of Health and Human Services has not defined conditions which trigger this subpart under the EPSLA.)

For full-time employees, two weeks of leave equates to 80 hours; for part-time employees, two weeks of leave equates to a number of hours equivalent to the number of hours usually worked in a two-week period.

Paid leave for reasons 1, 2, and 3, above, is paid at the employee’s regular rate of pay, capped at \$511/day. Paid leave for reasons 4 and 5, above, is paid at a rate equivalent to two-thirds of an employee’s regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

b. 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.

c. Unemployment Compensation Benefits

Under Executive Order 2020-57, and the federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.

Employees who are unable to report to work for reasons related to COVID-19 are referred to their General Manager or Regional Manager for information on unemployment compensation benefits. Such reasons include the following:

- Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
- Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath);
- Having close contact in the last 14 days with a confirmed COVID-19 diagnosis
- Needing to care for someone with a confirmed COVID-19 diagnosis

d. 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.”

The Oasis is 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 The Oasis engages in the interactive process to provide a reasonable accommodation.

4. Plan Updates and Expiration

This Plan responds to the COVID-19 outbreak. As the pandemic progresses, The Oasis will update this Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by The Oasis and in accordance with guidance from local, state, and federal health officials.