



COVID-19 Response and Action Plan

05-04-2020

COVID-19 Mission Statement

Across the country, Modu-Loc's services have been deemed essential, and we are focused on servicing our customers while complying with current health and safety standards and the recommendations of public health officials.

We are proud to participate in the collective effort to slow the spread of COVID-19, whether by supplying fence to support social distancing measures in the public, or by implementing our own protocols internally to protect our employees, customers, and partners.

The well-being of all our stakeholders is of paramount importance to us. This COVID-19 Response and Action Plan incorporates the most recent protocols and standards issued by the authorities. These standards are to be observed and enforced by all Modu-Loc employees, both within our own facilities and while on the job site.

While the COVID-19 pandemic presents an unprecedented challenge for all of us within the construction industry, Modu-Loc remains committed to our core values of Safety & Accountability and Family & Well-being. We will always prioritize the health and safety of our people above all else, and continue to provide best-in-class service to our clients throughout this difficult time.



Chris Muc, *EVP & COO*
Modu-Loc Fence Rentals LP
On behalf of the Response Team

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1. AT A GLANCE

1.1 Summary of Procedures

Until further notice, **ALL employees, trade partners and related parties are being strongly encouraged to:**

- Maintain safe distance of **at least 2 metres (6 feet)** between individuals
- Cancel all in-person meetings and instead hold meetings using phone call or video conference
- If an in-person meeting is absolutely necessary:
 - Limit the number of meeting attendees to a maximum of 5 people at a time. This includes at breaks and lunch hours.
 - An exception may be allowed if the meeting takes place in a space that can accommodate more than 5 people while maintaining a minimum physical distance of 2 metres (6 feet) between meeting participants
 - Participants should exercise recommended practices for reducing the risk of transmission as identified by the Centers for Disease Control and Prevention, Health Canada and the World Health Organization. These include:
 - Avoid touching your eyes, nose and mouth
 - Sneeze into a tissue or the bend of your arm, not your hand
 - Immediately dispose of any used tissues in a lined waste basket, and wash your hands afterwards
 - Clean and disinfect frequently touched objects and surfaces, and use alcohol-based hand sanitizer if soap and water are not available
 - Do not share personal items or supplies such as phones, pens, notebooks, PPE, tablets, etc.
 - Refrain from shaking hands with others
 - Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom and before eating
 - Ensure physical distancing (at least 2 metres / 6 feet distance) between individuals
- Always respect a safe distance of at least 2 metres (6 feet) in Modu-Loc corporate vehicles
- Cancel all work-related travel and replace with phone calls or video conferences, if applicable
- If commuting on public transit is essential, commute during “off-peak hours” to avoid crowded transit vehicles
- Postpone personal travel to a later date
- Respect protection measures recommended by [Health Canada](#)
- Maintain ongoing communication with the Response Team (responseteam@moduloc.ca) on any issue, question or concern related to COVID-19
- Apply the remote work policy
- Wear a mask or face covering if a minimum physical distance of 2 metres (6 feet) cannot be maintained

2. COVID-19 RESPONSE TEAM

2.1 Objectives

The Response Team (RT) is a team made up of Modu-Loc employees from various departments, whose responsibilities include:

- Developing an overall communications and contingency plan, and updating the plan as COVID-19 continues to evolve;
- Preparing a detailed contact list of essential employees, contractors, vendors, suppliers, service providers, and any other key contacts;
- Acting as a liaison with affiliated companies, employees, contractors, vendors, suppliers, service providers, customers, insurance providers, regulators, government and public health authorities;
- Determining the triggers for what has to happen, when, and by whom within our business in response to COVID-19, including:
 - who is authorized to make decisions and at what level in the business;
 - who is responsible for issuing communications, who will authorize the message to be communicated, and how such messages will be communicated; and
- Consideration of the extent to which our business can sustain disruptions to normal operations, including how staffing levels will be met, and the impact on employees, contractors, suppliers, service providers and customers.

2.2 Contact information

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For any questions on Modu-Loc's COVID-19 procedures and policies, to report that you have been in contact with an infected person, or to report that you have been diagnosed with COVID-19, please write to: responseteam@moduloc.ca.

2.3 Committed Supplier

We are committed to:

- Prioritize the health and safety of workers, visitors and members of the surrounding community;
- Establish and maintain the *COVID-19 Response and Action Plan*;
- Apply workplace inspection policies;
- Foster communication and a respectful work environment.

3. PREVENTION MEASURES

3.1 Basic rules

For the time being, the Public Health Agency of Canada (PHAC) recommends adopting the same basic respiratory hygiene measures applicable to the prevention of seasonal infectious diseases like influenza and the common cold.

These recommended hygiene measures include:

- Washing your hands as frequently as possible;
- Avoiding touching your eyes, nose and mouth;
- Covering your mouth and nose when you sneeze or cough;
- Avoiding hugs and handshakes;
- Avoiding using shared items such as coffee mugs, drinking glasses and kitchen utensils;
- Cleaning all objects and surfaces you handle regularly, such as doorknobs, keyboards, and phones;
- Avoiding crowds or groups of people, as well as contact with people exhibiting flu-like symptoms such as sneezing and coughing.

3.2 Preventive measures checklist and signage

Preventive measures checklist

Starting on May 4, 2020, all depots will have to complete the *COVID-19 Preventive Measures Checklist* at the end of each shift in order to ensure that the preventive measures implemented are checked.

The rigorous application of these measures aims to limit the risks of spreading COVID-19 and to take actions quickly when identifying non-conformity. The primary purpose of applying such measures is to protect the health of workers.

3.3 Regular cleaning of worksite equipment

Properly clean your offices, trailers, containers, workshops and other facilities. The frequency of cleaning each work area and surface depends on the number of people who use it, the duration of use, and the

presence of any objects which people might handle with their bare hands. Examples of surfaces that should be cleaned daily include: equipment cabinets, planning boards, remotes, battery chargers, and shared tools.

“High-touch” surfaces should be cleaned and disinfected every work shift. Some examples of high-touch surfaces include:

- Doorknobs and push bars
- Coffee makers and water fountains
- Shared radios and phones
- Handrails
- Toilet flush handles
- Chemical toilets; you should also place wash stations or, at a minimum, hand sanitizers outside the door
- Refrigerator door handles
- Conference/meeting room surfaces (for example, tabletops, chairs, PC cables, markers) and telephones
- Elevator buttons; an alcohol-based hand sanitizer bottle is to be accessible inside the elevator with hand wipes or alcohol-based hand wipes to clean the buttons prior to each use
- Copiers and fax machines
- Screens; use a disinfecting wipe, followed by a regular tissue or paper towel to avoid leaving too much fluid on the screen, and wipe dry with a micro-fiber cloth. You can refer to [these recommendations from Solutions IT](#). Personal keyboards, desks, heavy equipment controls, mobile phones, and small personal tools

3.4 Frequent cleaning of tools, PPE and equipment

Materials such as wood, rebar and pipes, temporary structures such as formwork and braces, and even shared tools such as drills, crowbars, and saws should be handled with gloves and are rarely touched with bare hands. Thus, they require cleaning but do not need to be disinfected. However, gloves can only protect when they are worn; removing and then putting them back on can cause cross-contamination. Think about properly cleaning, storing, and replacing your gloves.

Remember to frequently clean all your PPE (e.g. hardhat and glasses). Before removing them, make sure to wash your hands with soap and water for at least 20 seconds.

If tools are required to be shared person to person, a thorough cleaning with a disinfectant containing more than 70% alcohol is recommended.

3.5 Disinfectants and sanitizers

Modu-Loc has added hand sanitizers in all our depots and offices, as part of our overall measures to ensure the health of all employees.

3.6 Measures for toilet facilities

The posting of an effective hand-washing method, like the one recommended by the World Health Organization, is mandatory at all times. Place these hand-washing information signs near toilets and break rooms. Information on healthy hygiene habits will continue to be communicated, and the recommended signage should be posted.

1. Soap and paper towel dispensers, hand dryers and hand-sanitizing stations should be checked frequently. Place additional temporary soap dispensers in locations where soap often runs out, or where fixed dispensers are not available.
2. Place a garbage bin near the toilet's exit doors to encourage people to use a paper towel to open the door. If necessary, set up a separate supply of paper towels near the exit door.
3. Place paper towel dispensers near high-touch surfaces such as water coolers, kitchen/break room counters, conference rooms, and other locations with shared high-touch surfaces.
4. Display the cleaning log times (dates and time) in the washrooms and lunchrooms. Important: Before cleaning or disinfecting, a security task analysis specifying the risks and prevention measures associated with COVID-19 must be reviewed and communicated to all employees carrying out the task.

3.7 Deliveries preventive measures

Main measures to be taken with employees and suppliers who carry out deliveries to our sites and offices:

1. Access and delivery locations should be clearly identified.
2. All visitors and suppliers should disinfect or wash their hands (posters and hand sanitizer to be installed at the entrances).
3. Access is limited and restricted to entrances. There is to be no traffic without permission. If any suppliers have to come to work, they must fill out and sign the *Preventive Measures - Coronavirus (COVID-19) Declaration Form*, like all of our employees, and update Modu-Loc if conditions change. If any of the four answers in the questionnaire is "Yes", no entry is permitted to the site.
4. No contact or transfer of paper. Suppliers must ask for the name of the person who is receiving the materials - no signatures are required. The deliverers should be taking precautions or wearing gloves and must be aware of the distance to be respected (2 metres / 6 feet).
5. When packages or material are opened or moved to a different location, please be cautious and respect all the preventive measures, namely: wearing the proper PPE (i.e. gloves) and always washing your hands after unloading the materials.

3.8 Additional preventive measures on site

We recognize that there are some tasks that require workers to work in close contact with each other. In these situations, where a distance of 2 metres between employees **cannot** be achieved, we **must** first consider whether the task is truly **essential** at this time:

1. Can the task be delayed?
2. Can it be done in another way that eliminates close contact?

Below are the controls we expect all worksites to implement:

1. Limit the number of workers who must work in close contact and limit the amount of time the workers will be in close contact as much as possible.
2. Avoid close contact with multiple different workers; team them up and keep them that way.
3. Each worker must wear a cloth face covering or a surgical mask, if available, when working on tasks that require close contact of less than 2 metres (6 feet):
 - a) In this situation, the intent of the cloth face covering or the surgical mask is to keep the virus contained in the event that one of the individuals could be carrying the virus without having any symptoms yet, as well as to prevent any touching of the face.
 - b) If using surgical masks, workers must:
 - i. Wash their hands before putting on the mask;
 - ii. Follow the manufacturer's recommendations and make sure there is no gap between their face and the mask;
 - iii. Avoid touching the mask while wearing it. If they do touch the mask, they must wash their hands; avoid touching their face, as the eyes are a gateway for the virus;
 - iv. After use, remove the mask by the strings, avoiding touching the mask itself as it may be contaminated. They must wash their hands after disposing of the mask.
4. When the task is completed, ensure the tools and equipment that were used while in close contact are cleaned and disinfected.

Work within 2 metres distance summary table

Setting	Individual	Activity	Type of PPE or procedure
On site activities	All workers and trade partners	Activities that can be performed in isolation or by maintaining a physical distance of at least 2 metres / 6 feet	If able to maintain spatial distance of at least 2 metres / 6 feet or separation by physical barrier: <ul style="list-style-type: none"> • No additional PPE required – however if this situation changes, additional PPE must be used.
		Activities that cannot be performed in isolation or by maintaining a physical distance of at least 2 metres / 6 feet	Droplet and contact precautions, including: <ul style="list-style-type: none"> • Eye protection (i.e. goggles) • Gloves (if required) • Cloth face covering or surgical mask (if required)

Examples of practices to adopt in different settings

Vehicles transporting workers from one location to another

Before use

- Validate that the use of the vehicle to transport passengers is essential.
- Check beforehand that occupants do not have flu symptoms.
- Disinfect the high-touch surfaces of the vehicle (steering wheel, gear stick, radio, seat belts).
- Assign if possible, one (1) driver per shift to reduce the number of people who will handle the controls. Otherwise, disinfect the high-touch surfaces between drivers.

During use

- Limit passengers and seat the occupants as far as possible from each other.
- Limit all conversation. Otherwise, speak in front of you.
- Require that personal belongings are to be kept on them inside the vehicle.
- No more than two people are allowed to occupy a vehicle at any given time.

After use

- Disinfect the high-touch surfaces.

Mealtimes

- Ensure thorough hand washing before and after the meal.
- Have the workers eat in rooms large enough so that there is a distance of more than 2 metres/6 feet between each of them. Provide additional break areas if necessary.
- If no other room is available, modify or stagger the mealtimes to have a limited number of workers in the lunchroom at all times.
- Have the same groups of workers eat together at the same time, in the same room, day after day.
- If workers eat outside, make sure workers respect the minimum distance of 2 metres/6 feet between each of them.
- Do not share food.
- Do not exchange cups, glass, plates, utensils; wash dishes in hot water with soap.
- Replace common water dispensers with individual water bottles to avoid having more than one person touch the dispenser.

Modu-Loc protocol for mask usage

This pandemic requires extreme methods of control on our worksites to help limit exposure to, and the spread of COVID-19. One of the controls, as per directives from health authorities, is physical distancing. This means we need our workers to maintain a 6 foot/2metre distance from one another. It has therefore

been decided, after **careful review of the best available health and scientific evidence, and from direction by national and international bodies**, that in situations where the 2 metre/6 foot distance cannot be achieved, **a disposable or reusable mask or approved face covering should be worn by Modu-Loc employees.**

4. WORKPLACE POLICIES

4.1 Work from home policies

All Modu-Loc employees whose job function permits remote work, work from home. All depots will remain open to accommodate those who cannot work remotely.

Solutions IT will ensure that systems and devices are correctly configured to enable work from home. We have implemented MS Teams company-wide in order to facilitate communications while a large percentage of our workforce reports in from home.

Our objectives are to ensure business continuity, minimize impact on our scheduled jobs, continue to serve our clients, and protect the health and safety of our worksite employees who remain on the front lines.

4.2 Travel and self-isolation measures

We ask you to take the following measures regarding future travel. Note that these measures will apply until further notice.

- **Travel restrictions:**
 - To limit the spread of COVID-19, the Government of Canada advises to avoid all non-essential travel outside of Canada until further notice.

- **Business travel:**
 - All non-essential business travel is cancelled until further notice. Business trips are considered essential when they are critical to business operations, e.g. flights to remote worksites.
 - If you travel outside of Canada, you will be required to self-quarantine upon your return for a period of 14 days, and to monitor and report any symptoms of COVID-19 infection (fever, cough or shortness of breath).

- **Attendance at external professional events**
 - If you were scheduled to take part in an external event to take place before September 1, 2020 – whether as an attendee or speaker – please cancel your participation.

- **External education/training sessions**
 - If you were scheduled to take part in an external training/educational activity that requires in-person participation, please contact your Manager to postpone or cancel this activity.

- **Personal/leisure travel**
 - If you are returning from outside Canada, please complete the *Preventive Measures - Coronavirus (COVID-19)* Declaration Form regardless of where you have been. You will be required to work from home for 14 days following your return, and to monitor and report any symptoms of COVID-19 infection (fever, cough or shortness of breath). If your job function does not allow you to work from home, please discuss the situation with your Manager.

5. INTERNAL GUIDELINES AND MITIGATION MEASURES

5.1 Access to the workplace measures


Our Field Teams: Protecting them is our priority

We are maintaining our active operations and are in constant communication with our clients and trade partners. We are also closely monitoring the situation on job sites.

Mandatory STOP poster at the entrance of our facilities

Starting on May 4, 2020, everyone entering our depots will be asked by a “STOP” poster to remain off site or outside of the office, and to call a dedicated COVID-19 contact from the depot (typically the Operations Manager or Supervisor), if they answer “Yes” to any one of the questions asked.

If the answer is “Yes” to any of the three questions on the COVID-19 STOP poster, the person is not allowed to enter the depot.





COVID-19

IF YOU ANSWER YES TO ANY OF THESE QUESTIONS, DO NOT ENTER THE PREMISES, AND CONTACT:

(_____) _____

1. HAVE YOU RETURNED FROM AN INTERNATIONAL TRIP IN THE LAST 14 DAYS?
2. DO YOU CURRENTLY HAVE ANY OF THE FOLLOWING SYMPTOMS, OR ANY COMBINATION OF THESE?
 - a. FEVER (OVER 38°)
 - b. COUGHING
 - c. DIFFICULTY BREATHING
3. HAVE YOU BEEN EXPOSED TO A PROBABLE OR CONFIRMED CASE OF COVID-19?

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE INDIVIDUAL LISTED ABOVE.

Mandatory questionnaire for all employees and visitors

In an effort to act preventatively and in conjunction with authorities, as of May 4, 2020, Modu-Loc implemented a mandatory questionnaire called the *Preventive Measures - Coronavirus (COVID-19)* Declaration Form for all new workers and visitors. The questionnaire must also be completed by all employees (administrative, supervisory, and field staff) on a weekly basis.

From a practical perspective:

1. A. All visitors must complete the *Preventive Measures - Coronavirus (COVID-19)* Declaration Form before entering the facility;
B. All new employees have to complete the *Preventive Measures - Coronavirus (COVID-19)* Declaration Form before starting their first shift;
C. Current employees must complete the *Preventive Measures - Coronavirus (COVID-19)* Declaration Form every week, no later than end of day each Friday. If an employee sees a change of conditions and answers “Yes” to one of the three questions in a given week, they must immediately contact their Manager and place themselves in preventive quarantine;
2. Anyone who answers “Yes” to any question must notify the Operations Manager or Supervisor for that depot, and immediately place themselves in preventive quarantine (no access to the facility is permitted);
3. All “positive” responses should be digitally centralized and forwarded to the Response Team (responseteam@moduloc.ca) to ensure proper ongoing monitoring of our work sites.

Additional assessment questionnaire recommended by the Government of Canada:

<https://ca.thrive.health/covid19/>

5.2 Handling a confirmed case of COVID-19

1. Notify the Response Team immediately by sending an email to responseteam@moduloc.ca, or by contacting any one of the members directly using the contact information supplied in section 2.2 of this document.
2. Close the depot until all measures are put in place.
3. The client, subcontractors, landlord and/or other building tenants or visitors should be notified. The timeline identified by the investigation team should be shared, as appropriate. Reach out to the Response Team to assist with any legal or communication requirements.
4. Immediately begin executing the cleanup protocol determined by the Response Team.

5. Identify the people and areas that the infected person passed through. Establish a timeline of the most recent dates and times the employee was on job sites or in the office. Trace the impacted employee's steps back 14 days. The team should then:
 - Identify the people who have been within 2 metres of the contaminated person for more than 15 minutes in the last 14 days;
 - Review the likely locations the employee recently passed through or was known to frequent;
 - Interview other employees in the person's crew or department, as well as employees close to the individual; and
 - If possible, interview the affected individual.
6. Based on the above, taking into account the assessment of where the infected employee has been, and the areas the person has frequented; the following steps are to be taken:
 - People who have been within 2 metres of the contaminated person for more than 15 minutes in the last 14 days, or anyone who was around the person while they were coughing or sneezing, should be considered *high risk* and should be asked to self-quarantine at home, and contact their personal health care provider.
 - Compile a list of locations and surfaces at the site with which the infected employee may have come into contact. Sort these locations into three categories:
 1. High contact surfaces: Surfaces throughout the site that should be considered potentially contaminated due to either direct contact or secondary transmission, and must be included in the cleaning scope.
 2. Impacted, "non-high" contact surfaces: Surfaces throughout the site known to have been or highly likely to have been directly impacted by the employee (e.g. touched, sneezed on, etc.). These areas should be included in the cleaning scope.
 3. Non-impacted, "non-high" contact surfaces: Non-high contact surfaces that are not suspected of being directly impacted by the employee and are considered lower risk. These areas are generally not included in the cleaning scope.
7. Share surface information with the delegate working with the cleaning crew on executing the cleanup plan. Share at-risk employee information with responseteam@moduloc.ca.
8. Response Team will provide the right messaging to employees, subcontractors and, if needed, external parties. Basic communication would include:
 - Facts and timeline from the investigation, if appropriate
 - Details about contamination efforts
 - Instructions to monitor their symptoms
 - Employee assistance program information
 - Reminder for prevention tips

- Reminder to contact Response Team with questions
9. Site will re-open when all measures are in place and the Response Team approves it.
 10. Employees can return to work after getting approval from their Manager.

5.3 Return to work protocol

Any employee returning to work from self-quarantine, quarantine, hospitalization, or travel outside of Canada is required to complete the *Return to work after quarantine* declaration form.

The completed form is to be sent to the Response Team PRIOR to any return to work.

The Response Team will review each situation and approve the return to work.

Any employee requiring hospitalization or who tests positive for COVID-19 must receive a medical clearance certificate before a return to work request can be approved.

If you were exposed to a person who has tested positive for COVID-19, or if you yourself have tested positive, **immediately notify the Response Team** via responseteam@moduloc.ca, and **stay home**.