Aspen DCI	Aspen DCI LLP		Doc No:	PNPRP
	P.O. Box 405		Initial Issue Date	5/18/2020
	2015 Spence Street			
	Lufkin, Texas 75902 936-632-1269		Revision Date:	Initial Version
	Safety Management System			
	Revision No.	0		
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Purpose

Business continuity means ensuring that essential business functions can survive a natural disaster, technological failure, human error, or other disruption. Many existing business continuity plans anticipate disruptions such as fires, earthquakes, and floods. These events are restricted to certain geographic areas and the time frames are fairly well defined and limited. Pandemic disease, however, demands a different set of continuity assumptions since it will be widely dispersed geographically and potentially arrives in waves that could last several months at a time.

Assignment of Ownership of the Pandemic Disease Plan

A pandemic disease plan or disease containment plan should be developed for COMPANY and a coordinator appointed. Identify a workplace coordinator who will be responsible for dealing with disease issues and their impact at the workplace. This may include contacting local health department and health care providers in advance and developing and implementing protocols for response to ill individuals.

See command staff, Operations, Logistics, Planning and Finance sections below

Assumptions

A pandemic disease will spread rapidly and easily from person to person, affecting all businesses due to absenteeism. Businesses that are relied upon by other businesses will be facing the same massive absentee rates and will be unable to provide essential components to maintain the daily operations.

Risk assessments to identify the essential/critical components of our business operation need to be conducted. Recognize that a pandemic includes:

- Healthcare services not being available (they are already full at present with the usual ailments).
- Schools, churches and other public places not being open.
- Borders are partially or fully closed, especially airports, leaving people (our families, employees, business partners, customers and suppliers) "stranded".
- Essential materials and supplies may be limited due to distribution chains that are affected by the travel restrictions or absentee workers supporting those transportation means.
- Essential services around utilities, food distribution/access and banking systems may not be at "normal levels"; access to cash flow could be tight.
- People may not be willing to or able to come to work.

Effective Internal/Employee Communication Procedure

Communications during a pandemic involves both internal communications and external communications. Internal communication will be provided to employees to educate them about pandemic diseases and measures they can take to be prepared.

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• Aspen DCI conducts weekly staff/safety meeting for communication purposes.

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Key contacts, a chain of communications and contact numbers for employees, and processes for tracking business and employee status should be developed.

• Aspen DCI Management has contact information for each employee.

Risk communication is critical to inform employees regarding changes in the pandemic status. The following is one method for providing such information.

Alert: conveys the highest level of importance; warrants immediate action or attention.

Advisory: provides key information for a specific incident or situation; might not require immediate action. **Update:** provides updated information regarding an incident or situation; unlikely to require immediate action.

Provide continuous updates through internal & external communications when a pandemic is imminent:

- Notification to employees of operational changes
- Provide frequent updates about the pandemic status
- Provide advisories and alerts as conditions change
- Ensure vendors and suppliers have available a dedicated communications contact
- Monitor local, state, and federal pandemic updates

We will use our phone systems that can perform automatic dialing from a database with each employee contact number to send notifications and messages about alerts. The use of the company web-site also will serve as a portal for sharing information with employees and vendors.

Effective External/Customer Communication Procedure

A procedure must be developed to notify key contacts including both customers and suppliers in the event an outbreak has impacted our ability to perform services. This procedure must also include notification to customers and suppliers when operations resume.

Aspen DCI utilizes controlled entrance points and posted contact information at each point of entrance.

Business Continuity Planning

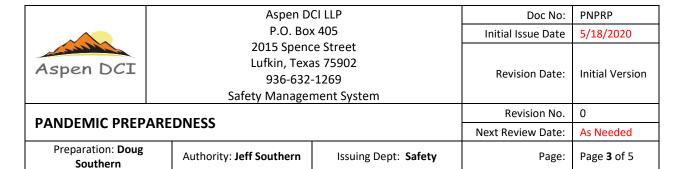
Business continuity plans should be prepared so that if a large or significant absenteeism of personnel become ill or changes in business practices are required business operations can be effectively maintained.

• Aspen DCI utilizes a large pool of contract workers in addition to its current staff.

COMMAND STAFF:

Incident Commander Jeff Southern	Organizes and directs all aspects of the incident response		
Public Information Officer	Creates and releases upon approval from the incident		
Jeff Southern	commander all information to the staff, media and public.		
Liaison Officer	Establishes and maintains relationships with outside		
Joey Southern	organizations		

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Safety Officer	Ensures the safety of all persons involved with the pandemic		
Doug Southern	Litaties the safety of all persons involved with the pandefille		
OPERATIONS SECTION:			
Operations Section Chief	Initiates and manages ongoing operations throughout a		
Nate Renfro	pandemic		
LOGISTICS SECTION:			
Logistics Section Chief	Meets the goods, services, and staffing needs of the operation		
Joey Southern	during the pandemic		
PLANNING SECTION:			
Planning Section Chief	Collects information and resources potentially relevant to the		
Doug Southern	pandemic and company operations		
FINANCE SECTION:			
Finance Section Chief	Monitors all expenditures and ensures fiscal resource availability		
Joey Southern	during the nandemic		

Pandemic Response by Pandemic Phase

Currently the WHO has created various phases for a pandemic but does not always relate to events locally.

Level 0 (WHO Phase 3) - Novel virus alert- not human-to-human transmission

Level 1 (WHO Phase 4) - Confirmed cases of human-to-human transmission of novel disease virus.

Level 2 (WHO Phase 5) - Suspected/confirmed cases in the local area.

Level 3 (WHO Phase 5) - Numerous suspected/confirmed cases in the local area.

Work At Home or Stay At Home Policy

Flexible work policies should be developed as possible. Workers should be encouraged to stay at home when ill, when having to care for ill family members, or when caring for children when schools close, without fear of reprisal. Tele-commuting or other work-at-home strategies should be developed.

 Aspen has implemented work from home status and reduced hours based on current pandemic situations.

Infection Control Measures

Guidelines for infection control are important to clarify the routes of transmission and the ways to interrupt transmission through measures of hygiene. Infection control is an essential component of pandemic management and a component of public health measures. Essential measures include:

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• The below recommendations/guidelines have been implemented to control contamination at Aspen DCI. Each employee has received personal hand sanitization kits for their use.

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- Hand washing and use of hand sanitizers should be encouraged by COMPANY supervision. Hand washing
 facilities, hand sanitizers, tissues, no touch trash cans, hand soap and disposable towels should be
 provided by COMPANY.
- Workers are encouraged to obtain appropriate immunizations to help avoid disease. Granting time off
 work to obtain the vaccine will be considered when vaccines become available in the community.
- <u>Limiting large or crowded gatherings of personnel if an outbreak or increased level of disease is in progress</u> Social distancing including increasing the space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings should be considered.
- Equipment and/or working surfaces shall be cleaned periodically. Clean all areas that are likely to have frequent hand contact (like doorknobs, faucets, handrails) periodically and when visibly soiled. Work surfaces should also be cleaned frequently using normal cleaning products.

Additional examples of infection control measures include:

- Stay at home when you are sick. If possible, stay away from work, school and from running errands. You will help others from catching your illness.
- Cover your coughs and sneeze into tissue, or cough into your shirt sleeve.
- Enhance existing housekeeping service by wiping down and disinfecting work areas (i.e. keyboards, telephones, desks, etc.) frequently.
- Enhance housekeeping services for general public use areas several times throughout the work period.
- Use personal protective equipment where appropriate to minimize exposure (i.e. gloves- for handling money, masks- for ill employees)

Implementation, Testing, and Revision of the Plan

The Pandemic Plan is reviewed and/or tested. The plan and emergency communication strategies should be periodically tested to ensure it is effective and workable.

Testing the plan will be accomplished by conducting exercises. Exercises range from low stress to full scale, hands on drills. A tabletop exercise is the easiest way to begin testing the plan. This type of exercise involves having discussions regarding a scenario that challenges the plan and the decision makers during an emergency. Functional exercises take on an additional level of complexity, in that they actually require participants to conduct functional components of the plan. This usually involves planning specific scenarios, creating pretend data and present issues that target an area within the plan to be tested.

Each of these methods of testing the plan requires extensive planning for the exercise and the evaluation. The evaluation is critical to revising the plan, by capturing actual responses during the exercise or drill objectively. Once this data is captured, an after-action report with recommendations to revising the plan should be completed within a few weeks of the exercise.

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 Aspen DCI will provide testing and a revision of this plan based on as needed basis due to symptoms and potential contact with known pandemic virus.

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Process for Implementing Lessons Learned Following a Pandemic Event

Following a pandemic event, the person responsible for implementation of the plan will identify learning opportunities and take action to implement any corrective actions.

A review of the plan's initiated actions completed will identify all action items that were taken versus and when the action items were to be completed via a gap analysis indicating when specific action items were to occur, and when actual completion dates were completed.

Input will be asked of our staff and management for what went well and what could be improved during the event. All findings that indicate where improvements can be made will be used as Lessons Learned process to modify this plan as required. Corrective actions will be assigned to specific management representatives as required. Implementation of the Lessons Learned will be communicated to all employees and a revised plan issued.

Training

Employees will be trained on health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread of the disease, and when it is appropriate to return to work after illness. Disease containment plans and expectations should be shared with employees. Communicating information with non-English speaking employees or those with disabilities must be considered.

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Documentation of all training is required and will be attached to this policy as completed.