

COVID-19 PROTOCOLS

Spartan has implemented a number of measures designed to combat the spread of COVID-19 in the workplace, as set forth below. In the event that a governing state or local jurisdiction requires social distancing, screening, or other measures that are more stringent than those contained in this policy, the state or local jurisdiction's rules will govern in that jurisdiction.

In order to maximize the effectiveness of these measures, Spartan requires cooperation from all of its employees. An employee's failure to follow the guidelines set forth in this policy may result in disciplinary action, up to and including termination.

Social Distancing

One way to potentially prevent the spread of COVID-19 in the workplace is for employees to practice certain social distancing guidelines. "Social distancing" generally means keeping space between yourself and other people. Employees are expected to exercise the following social distancing measures while at work:

- Stay at least 6 feet from other people
- Avoid contact with others, such as handshakes or embracing coworkers, visitors, or others in the workplace
- Do not gather in groups
- Avoid touching surfaces touched by others, to the extent feasible. When opening doors or touching other surfaces that others may have touched, use a paper towel, tissue, or glove
- Avoid face-to-face meetings if possible
- If a face-to-face meeting is unavoidable, the meeting time should be for a minimal period of time and conducted in a space that ensures a minimum of six feet distance
- Avoid anyone who appears to be sick, or who is coughing or sneezing
- Eat away from others
- Do not drive in the same car with other employees
- Wash your hands frequently with soap and water
- Wear mask or face coverings as outlined below

Whenever possible, meetings should be conducted via remote means, such as videoconference or teleconference, rather than in person. If Spartan deems it necessary to have an in-person meeting in the workplace, attendance will be limited to only those employees whose presence is necessary, generally no more than 10 employees. Spartan will limit and/or space chairs appropriately. If necessary, one-on-one meetings can take place in an office, as long as masks or face coverings are worn, and proper distance is maintained between participants.

Self-cleaning of your workspace is encouraged multiple times during your shift, with special attention to the most-used surfaces, such as keyboards, monitors, chair armrests, desks, or cubicle dividers.

Masks and Face Coverings

Employees, students, visitors, vendors, and all others who enter a Spartan workplace are required to wear masks or face coverings. Masks or face coverings must be worn in all areas in the workplace, except that employees do not have to wear masks or face coverings if they are in their personal office working **alone**. Spartan will make masks available to all employees. Employees can also wear their own masks or face coverings if they prefer.

Screening

As part of our commitment to provide a safe work environment, Spartan will engage in COVID-19 symptom screening while this policy is in effect. While Spartan is implementing this policy to attempt to reduce the possibility of transmission of COVID-19 in the workplace, the screening techniques in this policy do not guarantee that an individual who passes screening is uninfected or noncontagious. While this policy cannot cover all circumstances that may arise, employees are expected to follow this policy unless expressly exempted.

Spartan will engage in the following forms of screening in the workplace:

- **Temperature Screens.** Before entering and starting work at a Spartan facility, employees, students, vendors, and visitors are required to undergo a temperature check. If an employee, student, vendor, or visitor has a temperature of 100.3 degrees Fahrenheit or lower, he or she will be allowed to enter the workplace. If the employee or visitor has a temperature of 100.4 degrees Fahrenheit or higher, he or she will not be permitted to enter the workplace.

An employee who does not pass a temperature screen will typically not be able to return to work until:

- The employee's fever, if any, has subsided for 72 hours (three full days) without the use of medicine that reduces fever; AND
- Other symptoms have improved; AND
- Ten (10) days have passed since the employee's first symptoms.

An employee who believes his or her fever was caused by conditions other than COVID-19 should contact Human Resources.

- **Exposure Screens.** Upon returning to the workplace for the first time after a period of working from home or being furloughed, each employee will be asked:

- Whether he or she has been diagnosed with COVID-19 in the last 14 days. If the employee answers yes, he or she will be asked:
 - On what date the employee tested positive
 - Whether the employee has received two negative tests in a row, 24 hours apart
 - Whether his or her healthcare provider or local health department has advised the employee that he or she can cease their quarantine and return to work
- Whether he or she has been in close contact with someone diagnosed with COVID-19. If the employee answers yes, he or she will be asked:
 - On what date that person was diagnosed; and
 - Whether their healthcare provider or local health department has lifted their quarantine and when
- Whether the employee has traveled on a cruise ship or by air in the last 14 days
- Whether the employee has been exposed to COVID-19 in the last 14 days.
- **Symptom Screens.** Before entering a Spartan workplace, employees, students, vendors, and visitors will be asked:
 - Whether he or she is now experiencing or has in the past 14 days experienced any of the following:
 - Fever (above 100.4 degrees Fahrenheit)
 - Cough
 - Shortness of breath
 - Difficulty breathing
 - Fatigue
 - Muscle or body aches
 - Headache
 - New loss of taste or smell
 - Sore throat
 - Congestion or runny nose
 - Nausea or vomiting
 - Diarrhea

An employee who answers yes to any of the above will typically not be able to return to work until:

- The employee's fever, if any, has subsided for 72 hours (three full days) without the use of medicine that reduces fever; AND

- Other symptoms have improved; AND
- Ten (10) days have passed since the employee's first symptoms.

All records of screening conducted by the Company will be treated as confidential and kept accordingly.

Certain states and localities may require additional screening methods. Spartan will comply with all applicable state and local laws, regulations, and ordinances.

Employees who are sent home and are unable to work from home are permitted to use any accrued paid time off during the period when they have been sent home. Employees who do not have paid time off to use will be permitted to take unpaid leave for the period when they have been sent home.

Guidance from the CDC and other authorities frequently changes. Accordingly, Spartan may see fit to revise this policy based on the latest guidance. As with any Spartan policy, Spartan may revise or discontinue this policy at any time, for any reason, with or without advance notice. Spartan reserves the right to discontinue or lift certain screening measures or to implement additional screening measures at a given location, depending upon the circumstances present at that location.

Working from Home

While the COVID-19 pandemic is ongoing, teleworking arrangements (i.e., work-from-home arrangements) may be made on an "as needed basis" or set up on a regular schedule. Entering into a temporary teleworking arrangement is solely at the discretion of Spartan. Working remotely is not a contractual right, entitlement, or employee benefit and does not change the terms and conditions of employment with Spartan. Even if Spartan initially approves a work-from-home arrangement, Spartan reserves the discretion to discontinue the arrangement at any time.

Prior to approving or directing employees to work remotely on a temporary basis, managers must ensure that the following conditions apply:

- The nature of the work to be performed from the remote location is operationally feasible.
- The position has tasks which are portable and can be performed away from the main worksite.
- The overall quality and quantity of work performed in the remote location can be sustained by the employee.

Generally, to be eligible to work from home, an employee's job should meet the following conditions:

- Physical presence is not a job requirement during the term of the work-from-home arrangement
- It will not burden the team or the budget unfairly if the employee is permitted to work from home
- The employee's performance while working from home is measurable, meaning it is easily quantified and evaluated against specific targets
- The employee's access to equipment, documents, and data will not be impeded by teleworking
- The role the employee holds must be one in which security measures can be implemented at reasonable cost to protect any Spartan data, trade secrets, and confidential business information entrusted to the employee

Even if all these requirements are met, there may be other considerations that may result in denial of the request.

Spartan requires that any employee working remotely remain accessible, communicative, and productive during their time working remotely. While working remotely, the employee must be reachable via telephone, instant messaging, or email during agreed-upon work hours or specific core hours of accessibility.

Spartan reserves the right to inspect a home office during the employee's scheduled telework time to ensure that it is safe and free from hazards, or to maintain, prepare, inspect or retrieve Spartan-owned equipment, software, data supplies and/or furniture. Reasonable advance notice will be given to the employee. The employee agrees to ensure the home office is safe and ergonomically suitable and might be asked prior to and/or during the teleworking arrangement to provide photographs of the telework site.

Employees working remotely are still required to comply with all of Spartan's rules, policies and procedures. In general, the following principles should be used in telecommuting:

- Employees should make arrangements with their managers in advance of telecommuting.
- Employees should check in with the office regularly.
- Employees should inform their managers of their whereabouts, so they may be reached easily.
- Working at home means working, not taking time off. Work should be done in a quiet space away from typical household interruptions or other personal activities.
- Not all jobs, positions or duties are conducive to a work-from-home arrangement.
- All telecommuting arrangements must conform to the overtime, recordkeeping and meal break provisions of the Fair Labor Standards Act (FLSA) for employees covered by those provisions. If a non-exempt employee feels that it is necessary to work over their regularly scheduled hours in a week, the employee must seek prior approval from their

manager. Non-exempt employees are discouraged from working before or after set scheduled times to minimize overtime and prevent any temptation to work off-the-clock. If the employee is classified as a non-exempt employee, the employee understands that as a non-exempt employee, they are responsible for accurately recording all time worked (whether pre-approved or not) and submitting the hours worked each week to their manager. All time worked must be recorded using our timekeeping system. Employees are prohibited from working off-the-clock. If the employee is classified as an exempt employee, the employee understands that they will be paid a salary each workweek. The employee understands that if there are any concerns regarding their time or pay, they should bring those issues immediately to their manager or the Human Resources Department's attention.

Contacting Human Resources

Any employee who has questions or concerns relating to COVID-19 is required to contact, human.resources@spartan.edu, regardless, if you are working on campus or remotely.

DISCLAIMER

THIS POLICY DOES NOT ALTER AN EMPLOYEE'S AT-WILL EMPLOYMENT STATUS, WHICH MEANS EITHER EMPLOYEE OR THE COMPANY MAY TERMINATE EMPLOYEE'S EMPLOYMENT AT ANY TIME, FOR ANY REASON, WITH OR WITHOUT CAUSE, AND WITH OR WITHOUT NOTICE.