

Safety Policy & Procedure

MISTRAS Group, Inc.

Pandemic Policy

100-SP-050 Rev 2.1

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Management Approval

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Issue Authorization

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Document History

Revision	Date	Description
0	11/1/2015	Original Issue
1	03/16/2020	Name changed from Pandemic Influenza to Pandemic Policy
		Update to new template
		Formatting and verbiage changes
2	3/24/20	Addition of further pandemic safety measures and requirements
2.1	3/27/20	Clarifications to avoid confusion

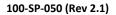




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1.0 Purpose/Scope

- 1.1 This procedure outlines the planned response by MISTRAS Group, Inc. and its divisions to a potential pandemic outbreak and MISTRAS' efforts to control effects due to the pandemic to the business and workforce. Employees of MISTRAS and its divisions are covered by this procedure.
- 1.2 This procedure will address actions required by MISTRAS and employees if a pandemic outbreak is declared. These actions will support the mitigation of spread as well as ensure business activities continue. Normal Sick Pay programs are in affect throughout the event. MISTRAS' Senior Benefits Manager will work with our program vendors to establish any applicable benefits. Questions regarding benefits should be directed to MISTRAS' Senior Benefits Manager. European locations are to comply with regional legislation and associated laws as directed by the regions HR departments.
- 1.3 This document serves as guidance to all other MISTRAS locations and work sites to assure consistent implementation of pandemic plans.

2.0 Responsibilities

- 2.1 The Group VP of Compliance along with the Group VP of Human Resources is responsible for the administration of this program and has full authority to make necessary decisions to ensure success of the program.
- 2.2 Corporate Pandemic Assessment Team (CPAT)
 - 2.2.1 Responsible for communicating to and working with Senior Management to establish company expectations and controls regarding efforts surrounding the pandemic.
 - 2.2.2 Provide guidance, as agreed upon with Senior Management, to Division Pandemic Coordinators on MISTRAS policy and expectations.
 - 2.2.3 Work with each MISTRAS location in addressing employee needs and any customer concerns.
 - 2.2.4 Maintains awareness with appropriate government agencies on the status of the pandemic and establishes protocols based from governmental/medical recommendations and best practices.
- 2.3 General Manager (GM) or applicable manager level based on location and need
 - 2.3.1 The GM of each MISTRAS facility shall serve as the Pandemic Coordinator for each individual location.
 - 2.3.2 The GM will notify the site under their authority along with other key contacts as applicable (e.g. Operations, Human Resources, Environmental, Health and Safety) that an outbreak has occurred.
 - 2.3.3 The GM will monitor the current situation utilizing guidance from MISTRAS Corporate, Center for Disease Control (CDC), World Health Organization (WHO), and other related websites to provide updates to site coordinators as deemed appropriate via the internal e-mail system.
 - 2.3.4 Materials covering the fundamentals of protection will be distributed by the GM to all remote sites under the GM's authority.
 - 2.3.5 Business related travel for both domestic and international travel will be determined by the GM based on input from MISTRAS and CDC travel warnings will be issued as necessary through the e-mail system.
 - 2.3.6 The GM will review and approve any site-specific deviations to this procedure.
 - 2.3.7 GM will evaluate, and if necessary, amend the lab's business continuity plan. If possible, and necessary, issue equipment to employees who can work remotely. Additional items to consider in business continuity plan:



- 2.3.7.1 Adjustments for travel risk mitigation.
- 2.3.7.2 Recruiting efforts, if staffing turnarounds, may need to be adjusted to account for "no shows" during TA time period.
- 2.3.7.3 Review materials on stock and ability of supply chain partner(s) to provide essential materials.
- 2.3.7.4 Create backfill plans for all roles critical to maintaining operations.
- 2.3.7.4 Make decisions of key expenditure to reduce unnecessary purchases to ensure the region retains cashflow.

2.4 Project Manager (PM)

- 2.4.1 The PM, or other individual as designated by GM, will serve as the Site Pandemic Coordinator.
- 2.4.2 If deemed necessary, the PM will develop a site-specific plan and provide a copy for approval to the GM (who will provide to MISTRAS Corporate Compliance for review).
- 2.4.3 The PM will attempt to communicate the planned pandemic response procedure prior to implementation with impacted clients, local health care agencies and/or other appropriate agencies within their area of operations.
- 2.4.4 The PM is responsible for the following actions:
 - 2.4.4.1 Develop a plan for monitoring site personnel.
 - 2.4.4.2 Assist in managing accountability for the travel of any site personnel who may travel out of state/province or internationally.
 - 2.4.4.3 Provide site wide training to employees on MISTRAS' efforts to control spread of outbreak, actions each individual can take to protect themselves and their peers.
 - 2.4.4.4 Alert the GM of any issues related to a potential outbreak within their area of operation.
 - 2.4.4.5 Distribute material covering the fundamentals of protection to all employees, contractors, and visitors.
 - 2.4.4.6 Each site will provide sufficient and accessible non-medical infection control supplies including but not limited to hand hygiene products and gloves to all employees, contractors, and visitors at their location. Medical respiratory masks may also be required should they prove to be effective deterrents to the spread of the virus.

2.5 Employees

- 2.5.1 Employees should practice good pandemic illness procedures to mitigate the risk of spread, including frequently washing hands, not touching their face, nose, eyes and practicing social distancing.
- 2.5.2 Employees must follow travel reporting procedures and self-report personal and professional travel via approved means.
- 2.5.3 If experiencing symptoms related to the outbreak the employee should not report to work.
- 2.5.4 Notify your manager if you encounter any person who travels to a location identified by the CDC as a level 2 or higher for the outbreak, or anyone exposed to the outbreak.
- 2.5.5 Employees should avoid large crowds where possible including sporting events, concerts, and cruise ships.



3.0 Procedure

- 3.1 CPAT provides notification to Senior Management regarding outbreak. If appropriate, CPAT recommends initiation of this policy.
- 3.2 CPAT communicates with GM of initiation of Pandemic Policy and steps being proposed based on outbreak levels.
- 3.3 CPAT works with MISTRAS locations do determine impact of any potential supply chain interruptions.
- 3.4 GM to notify all employees of Pandemic Outbreak upon declaration by CPAT, CDC, or other appropriate government agency.
- 3.5 GM should ensure the following items are provided in the workplace.
 - 3.5.1 Anti-bacterial soap/hand sanitizer in washrooms, lunchrooms, and common areas.
 - 3.5.2 Disposable tissues provided in offices, field locations offices, lunchrooms, and conference rooms as needed.
- 3.6 General Managers should limit work assignment locations that are known to be or potentially affected by the pandemic and commence monitoring international, and if applicable domestic, travel.
- 3.7 Employees should follow these steps upon returning from an area affected by the Pandemic:
 - 3.7.1 Notify the GM of travel to the impacted area.
 - 3.7.2 If necessary, practice self-quarantine in accordance with any established guidelines.
 - 3.7.3 Wash all clothes before others have contact with them.
 - 3.7.4 Wash hands thoroughly before contact with others.
 - 3.7.5 Wash equipment as prescribed by manufacturer.
- 3.8 Sick Employees or Symptomatic Employees
 - 3.8.1 Employees with flu symptoms, or those described for the pandemic, will be sent home. GMs and PMs will implement a plan to transport these individuals to their point of origin for treatment, where possible.
 - 3.8.2 Employees who have been exposed to the pandemic or are suspected of being ill will also be sent home. GMs and PMs will implement a plan to transport these individuals to their point of origin for treatment, where possible.
 - 3.8.3 All employees will be asked to provide a release from a doctor prior to returning to work if known to have had the illness.
 - 3.8.4 Sick employees can utilize Personnel Time Off (PTO) or vacation time during this period if necessary.

3.9 Housekeeping

- 3.9.1 During periods of potential pandemic, or even localized, outbreaks extra effort should be applied to housekeeping and sanitizing of working surfaces.
- 3.9.2 Pathogens can survive on hard surfaces for differing lengths of time based on the pathogen. Therefore, it is recommended to have employees clean working surfaces frequently during the day to help minimize the spread of the pathogen.
- 3.9.3 Where employees are using trash cans or wastepaper baskets to dispose of used tissues these should be emptied by persons wearing suitable personal protection such as surgical gloves. The surgical gloves should then be turned inside out when removing and disposed of safely. Hands must be thoroughly washed and sanitized.



3.9.4 At the close of business each day, while working onsite at a client facility, employees shall secure each site completely, as if shutting down for an extended hiatus.

3.10 Remote Work

- 3.10.1 Remote work may be authorized depending on the significance of the outbreak. Direction will be provided by MISTRAS Executive Management on how MISTRAS will handle remote work.
- 3.10.2 If necessary, employees may use PTO and vacation time during times of outbreak; however, scheduling and planning will need to be addressed with the appropriate manager.

4.0 Communications

- 4.1 Communications regarding the pandemic outbreak will be centralized and distributed from the CPAT via the Human Resources (HR) or Compliance Departments.
- 4.2 As necessary during an outbreak, MISTRAS will post information related to policy and expectations on our SharePoint site and will be updated regularly. Employee travel tracking tool will be posted on this site.
- 4.3 Regular calls will be scheduled with the CPAT to provide recommendations and guidance to senior management and ultimately the rest of MISTRAS

5.0 Working Onsite at a Client facility

- 5.1 If required and provided by the client, employees will initially complete a site access health assessment form when getting to their assigned site.
- 5.2 Group Size
 - 5.2.1 Activities where groups of employees congregate shall be minimized.
 - 5.2.2 Tailgate and assessment meetings shall be conducted outside. Additional requirements include:
 - 5.2.2.1 Employees shall maintain a 6-foot (2 meter) separation.
 - 5.2.2.2 Employees shall face upwind when attending these meetings.
 - 5.2.2.3 Group sizes shall remain small, with fewer than eight (8) people in any meeting/gathering.
- 5.3 Separation/Social Distancing
 - 5.3.1 If a task can be safely completed by a single worker, multiple workers should be avoided.
 - 5.3.2 Social distancing should be practiced during all work activities
 - 5.3.2.1 Employees shall maintain a 6-foot (2 meter) separation.
 - 5.3.2.2 Personal contact such as handshakes shall be avoided.
 - 5.3.2.3 A Social Distancing Coordinator shall be assigned to monitor social distancing at all times. This person should be selected from a MISTRAS site-representative such as the PM or Lead Technician.
 - 5.3.2.4 Work planning should be adjusted to maximize social distancing between employees, teams, and site personnel.
 - 5.3.2.5 A hazard assessment shall be conducted, and proper hazard controls shall be implemented in cases where social distancing cannot be safely maintained between employees.
 - 5.3.2.6 Employees shall not congregate in close-proximity areas such as trailers, smoking areas, etc.



- 5.3.2.7 Employees shall continue practicing social distancing during breaks, avoiding large groups. An example of this would be to take lunch breaks in your car.
- 5.3.2.8 The onsite PM and/or Lead Technician shall present the hazard assessment and sign everyone in, requiring discussion and participation. Pictures with a date stamp shall be taken of all personnel signed in.
- 5.3.2.9 Onboarding rooms shall be setup to maintain 6-foot spacing between participants.

5.4 Documentation

- 5.4.1 A single person shall manage the Job Safety Analysis (JSA) and work permits. This individual will list the names of the workers. It is important to remember that the pen and permit books shall not be passed around.
- 5.4.2 If required by the client, personnel shall complete and sign a verification of understanding document then leave the document on their desk. The individual managing documentation shall photograph each document then dispose of the paper documents using universal precautions.

5.5 Cleaning

- 5.5.1 Each work crew shall define sanitation needs and implement appropriate protocols using deep cleaning guidelines for their worksite, based on crew size and activity, as part of their Project Hazard Assessment.
- 5.5.2 Before and after use, hand tools and equipment controls shall be sanitized by the workers, using appropriate disinfectants.
- 5.5.3 Employees are encouraged to wash their hands regularly and frequently, especially when arriving onsite, after going to the bathroom, and before and after eating.
- 5.5.4 Employees shall use hand sanitizer when entering and exiting a room being utilized for onboarding.
- 5.5.5 All employees will be issued new pens for onboarding. These pens will be kept by the employees and not shared with others.

5.6 Additional Safety Measures

- 5.6.1 MISTRAS employees shall verify details of deep cleaning protocols with their accommodations providers (i.e. camps, hotels, motels, Air B&B, leased accommodation, etc.).
- 5.6.2 Employees shall not use smokeless tobacco onsite.