

	Document Type:	Procedure
	Dept./Program:	Human Resources
	Issued Date	August 14, 2020
	Effective Date:	December 28, 2021
	Version No.:	10.0
Project Based Personnel COVID-19 Management Procedure		

Table of Contents

1.0	Purpose.....	1
2.0	Scope.....	2
3.0	Responsibilities & Deviation from Procedure	2
4.0	Positive Test Reporting Requirements.....	2
5.0	Return to Work Requirements	3
6.0	Health Screenings	3
7.0	Close Contact with Known Positive	4
7.1	Critical Infrastructure Employees	4
7.2	Non-Critical Infrastructure Employees	5
8.0	Hygiene Practices.....	6
9.0	Social Distancing	6
10.0	Meetings and Gatherings	6
10.1	Off-Site Meetings/Work	7
11.0	Face Coverings.....	7
12.0	Equipment Use.....	7
13.0	Cleaning and Disinfection of Shared Areas	8
14.0	Transportation	8
15.0	Travel	8
15.1	Business Travel.....	8
15.2	Personal Travel	8
15.3	International Travel.....	9
16.0	Vaccination Verification Program	9
16.1	Verification Process	9
16.2	Exceptions.....	10
17.0	Communication.....	10

1.0 **Purpose**

The purpose of the **Project Based Personnel COVID-19 Management Procedure** (the “Procedure”) is to provide project based employees (i.e. personnel working in locations other than the Herndon, Upper Marlboro and Moyock corporate offices or at an ACADEMI Training Facility) of

Constellis Holdings, LLC or its subsidiaries (the “Company” or “Constellis”) with guidance and instructions for the mitigation of the transmission of COVID-19 and provide guidance on procedures in case an individual exhibits COVID-19 symptoms. The Procedure is intended to balance the health and safety of the workforce with flexibility and efficiency while ensuring that the Company complies with the most recent guidance from the Centers for Disease Control (“CDC”) and any state or local requirements.

It is the responsibility of each employee to self-monitor for COVID-19 like symptoms, to report any symptoms immediately to their chain of command, and to stay at home if symptomatic.

2.0 Scope

This Procedure applies to Constellis employees, subcontractors, independent contractors, and any other individual that works at any project location other than the Company’s corporate offices in Herndon, Upper Marlboro or Moyock or an ACADEMI Training Facility (the “work sites”). Moyock and Upper Marlboro based employees who are involved in training activities are also required to follow procedures as outlined in *Moyock Training COVID-19 Management Procedure*, *National Capital Region Training Center COVID-19 Management Procedure*, and *ACADEMI NW and SE Training Centers COVID-19 Management Procedure*. Employees visiting corporate offices are required to follow *Corporate Facilities COVID-19 Management Procedure* while at one of the offices. Supervisors/managers are required to follow the *Supervisor COVID-19 Management Procedure*.

This Procedure is to be followed absent contrary written customer direction, or state/local ordinance.

3.0 Responsibilities & Deviation from Procedure

It is the responsibility of all employees that fall within the scope of this Procedure to comply with all requirements outlined below and immediately report any concerns regarding their ability to follow the guidelines contained within the Procedure to their chain of command. This Procedure captures the best guidance known at the time and is based upon the type of activities currently being performed. The Company and its personnel, however, must remain flexible and creative to ensure the essential business of the organization can be carried out while also protecting the health and safety of employees and visitors. If adherence to this Procedure is not feasible due to operational realities in effect at a particular time, the area of non-conformance must be reported to a Director-level manager or higher so viable alternatives can be discussed and determined. No employees or supervisors may modify the requirements of this Procedure without the authorization from a Vice President-level manager or higher or a member of the COVID-19 Task Force, and written notification of the modification to covid19info@constellis.com. Failure to properly follow this Procedure or to make proper notifications are required by this Procedure may lead to discipline.

If an employee witnesses another employee not adhering to any of the below, they are responsible for reminding the employee of the guidelines. If the individual does not comply with the request to adhere to the guidelines or if the employee feels uncomfortable reminding the non-compliant employee, the employee should report the matter their chain of command.

4.0 Positive Test Reporting Requirements

Personnel who receive a positive COVID-19 diagnosis must report this information to their direct manager or supervisor as soon as possible, including a copy of their positive test result, so the Company can undertake the necessary steps to conduct contact tracing, and to ensure the ongoing health and safety of our workforce. Employee identity will remain confidential consistent with applicable laws.

Any manager notified of an employee's positive test result must immediately follow procedures as outlined in the *Supervisor COVID-19 Management Procedure*. If the supervisor or manager does not have all of the required information, they should provide what information they have initially and the COVID Task Force and Human Resources will work with the manager to obtain any outstanding information.

Employees who receive a positive test result shall not report to work until satisfying the requirements set forth in Section 5.0. Employees should use whatever leave they have regardless of type (i.e. sick or vacation leave), in addition to Leave Without Pay ("LWOP"), during any time they are not permitted to work.

5.0 Return to Work Requirements

Absent customer or client guidelines, Employees that test positive will not be allowed at any work location and will be removed from the schedule until their isolation period has ended. As of December 27, 2021, the CDC's isolation period is 5-days. Even after 5 days, employees will not be allowed to return to work until they are fever free for at least 24 hours (without the use of fever reducing medicine), and other COVID-19 symptoms have improved. Employees must continue to practice social distancing and wear a face covering for an additional 5-days after their isolation period. Note that loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation.

Note that if the employee is asymptomatic but develops symptoms **after** testing positive, the 5 days starts upon the date the employee first develops symptoms.

. An employee may return to work sooner only if they receive certification from a healthcare provider that they are virus-free (two negative nasopharyngeal swab specimen tests in row 24-hours apart) and fit to return to work.

6.0 Health Screenings

Employees are responsible for self-monitoring for the following symptoms of COVID-19 (as defined by the CDC) *prior to coming to work* and must stay at home until they are symptom free for at least 24 hours without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). The symptoms should be newly onset and/or not attributable to a medical or other pre-existing condition other than COVID-19 (allergies, exercise, stress, insomnia, gastrointestinal issues, etc.).

- Fever of 100.4°F or higher
- Feeling feverish (chills, sweating)
- Cough
- Difficulty breathing
- Muscle or body aches
- New loss of taste or smell
- Sore throat
- Vomiting or diarrhea

If an employee experiences COVID-19 like symptoms while at one of their assigned work sites, they must leave work immediately and not return until symptom free for at least 24 hours without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants).

Employees certify they have conducted this daily health screening prior to reporting to work and are not experiencing symptoms through the completion of their daily timesheet.

If any individual experiences the below emergency warning signs for COVID-19, call 911 immediately. Notify the operator the individual may have COVID-19 and ensure the individual and those around them are wearing a facemask and any other PPE as appropriate.

- Trouble breathing
- Persistent pain or pressure in the chest
- New confusion or inability to arouse
- Bluish lips or face

7.0 Close Contact with Known Positive

Close contact is defined as any individual who was within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from two days before illness onset (or, for asymptomatic individuals, two days prior to positive specimen collection) and until they were isolated.

Unvaccinated employees or employees who are more than six months out from their second mRNA vaccine dose (or more than two months after the Johnson & Johnson vaccine), and have not yet received a booster, may not report to the facilities if they have been in close contact with someone for 5 days followed by strict mask use for an additional 5 days.

Vaccinated employees who have received their second mRNA vaccine dose within the last six months (or within two months of receiving the Johnson & Johnson vaccine) or have received a booster may report to the facilities but are required to wear a face covering for 10 days after exposure. For those exposed, it is best practice to test for COVID 5 days after exposure. If symptoms occur, individuals may not report to work and unless a negative test confirms symptoms are not attributable to COVID-19.

California worksites only: Close contacts must follow Section 7.2, regardless of critical infrastructure status. Note that employees are **not** considered to have had “close contact” if they were wearing a Company provided respirator (such as an N95 facepiece respirator).

7.1 Critical Infrastructure Employees

Critical infrastructure employees (for example, personnel working in the emergency services, energy, government facilities, defense industrial base, transportation systems, and nuclear reactors, materials, and waste sectors; see <https://www.cisa.gov/identifying-critical-infrastructure-during-covid-19> for the comprehensive list) may report to work provided they meet the conditions in this Section. Company employees that hold the following positions are considered critical infrastructure employees: security guard, security officer, dispatcher, K9 handler, firefighter, Emergency Medical Technician, Paramedic, and personnel working on federal, state, and local government facilities, to include military bases and compounds. If you have a position that is not listed here, contract management should email covid19info@constellis.com for assistance in determining whether the position qualifies as a critical infrastructure position. Note that customer direction can supersede the guidance set forth in this Procedure, and therefore you may be required to follow more stringent guidance regardless of your position.

1. **Asymptomatic:** Remain asymptomatic in accordance with CDC guidelines, the following symptoms or combinations of symptoms are to be used to determine if employee is experiencing potential COVID-19 symptoms. The symptoms should be newly onset and/or not attributable to a medical or other pre-existing condition other than COVID-19 (allergies,

exercise, stress, insomnia, gastrointestinal issues, etc.). If a critical infrastructure employee has any of these symptoms, they are NOT asymptomatic and may NOT report to the worksite until they satisfy the requirements set forth in Section 6.0.

- Fever of 100.4°F or higher
 - Feeling feverish (chills, sweating)
 - Cough
 - Difficulty breathing
 - Muscle or body aches
 - New loss of taste or smell
 - Sore throat
 - Vomiting or diarrhea
2. **Pre-Screen:** Measure their temperature and assess symptoms prior to starting work. Ideally, temperature checks should happen before the individual enters the facility.
 3. **Regular Monitoring:** The employee must continue to self-monitor to ensure they do not experience symptoms.
 4. **Wear a Mask:** The employee must wear a facemask at all times while in the workplace for 14 days after last exposure. Employee or Company provided facemasks are permissible.
 5. **Social Distance:** The employee must maintain 6 feet apart and practice social distancing in the workplace as work duties permit.
 6. **Disinfect and Clean Work Spaces:** All work and common areas such as offices, bathrooms, and, shared electronic equipment are cleaned and disinfected routinely.

The employee shall meet all of these conditions for as long as the employee continues to have close contact with the individual who has a positive COVID-19 diagnosis.

Managers/supervisors shall refer to the *Supervisor COVID-19 Management Procedure*.

7.2 Non-Critical Infrastructure Employees

Unvaccinated non-critical infrastructure employees or those who are more than six months out from their second mRNA vaccine dose (or more than two months after the Johnson & Johnson vaccine), and have not yet received a booster, may not report to the facilities if they have been in close contact with someone for 5 days followed by strict mask use for an additional 5 days.

Vaccinated non-critical infrastructure employees who have received their second mRNA vaccine dose within the last six months (or within two months of receiving the Johnson & Johnson vaccine) or have received a booster may report to the facilities but are required to wear a face covering for 10 days after exposure. For those exposed, it is best practice to test for COVID 5 days after exposure. If symptoms occur, individuals may not report to work and unless a negative test confirms symptoms are not attributable to COVID-19.

Supervisors may approve non-critical infrastructure workers to work from home during this period if possible, based upon customer requirements and job duties. This determination must be made consistent with the Company's Telework Policy.

California worksites only: Employees may return to work after ten days from the last date of close contact with the known positive, as long as the employee remains symptom free, or an order to quarantine for more than ten days is issued by a local or state health official. The employee may also return after seven days with a negative PCR test collected after day five if there is a critical staffing shortage.

8.0 Hygiene Practices

Unless precluded because of specific work site limitations, employees must:

- Wash hands often with soap and water for at least 20 seconds. If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol (cover all surfaces of the hands and rub them together until they feel dry).
- Avoid touching their eyes, nose, and mouth with unwashed hands.
- Throw used tissues in the trash.
- Maintain social distancing practices (at least 6' between personnel).

Employees assigned to a work station where job tasks require frequent interaction inside six feet with other persons shall be provided with hand sanitizer where feasible at their work station.

It is the employee's responsibility to ensure they read and understand the proper use of gloves and facemasks per Attachment A of this document.

It is the responsibility of each employee to self-monitor for COVID-19 like symptoms, to report any symptoms immediately to their chain of command, and to stay at home if symptomatic.

9.0 Social Distancing

All personnel who have not been certified under the requirements of the Company's Vaccination Verification Program (*see* Section 16.0, below) must practice social distancing, meaning that a minimum of 6 feet of separation is maintained between all personnel (hereinafter, "Social Distancing Mandate"). All managers and supervisors are required to take any available actions to modify the process in which employee duties are carried out to comply with the Social Distancing Mandate. Such actions include, but are not limited to:

- Utilizing flex spaces (conference rooms, break out rooms, etc.) to ensure minimal amount of personnel are in the same enclosed space;
- Assigning meeting rooms to certain groups to minimize cross-contamination and exposure;
- Assigning specific bathrooms in common use buildings for use of specific groups only;
- Keeping certain areas closed to help maintain cleaning standards

All employees must comply with any signage and/or additional social distancing requirements established by the work site building management, to include doors and walkways that are designated in one direction, areas that are closed and/or other modifications to movements through work areas to maximize social distancing and decrease cross-contamination of work spaces.

10.0 Meetings and Gatherings

Unless precluded because of post-orders or other job duties, personnel are limited to no more than 10 people, or the number of people that can congregate in one area and still abide by the Social Distancing

Mandate, whichever is lesser, from gathering in a common space at any given time. This includes meetings, break room, and any other situation that may cause multiple people to gather together. Postings limiting the occupancy of such spaces shall be posted at the entrances to the areas in Company controlled buildings.

10.1 Off-Site Meetings/Work

Personnel are encouraged to utilize remote meeting technology in lieu of in-person meetings when meeting with outside clients, consultants, or other business partners. In the situation where employees must meet or work off site due to specific business requirements, they must follow Section 15.0 if sharing a vehicle.

11.0 Face Coverings

All personnel who have not been certified under the requirements of the Company's Vaccination Verification Program (*see* Section 16.0, below) are required to wear clean and undamaged face-coverings (e.g. surgical mask, cloth face covering, etc.) covering both their mouth and nose in situations that do not permit social distancing, during assignments that require interaction with customers, and when moving through common area spaces. For this Procedure, "common area spaces" include bathrooms, hallways, stairwells, elevators, kitchens and break rooms, and lobbies.

Employees may use their own masks, but should review CDC face cover guidelines as set forth in Attachment B in advance. Acceptable face coverings are solid in color with no prints, logos, insignias or other markings. The Company will provide an acceptable face covering if the employee does not have access to one meeting these criteria.

To the extent permitted by law, employees' individual medical conditions that might restrict their ability to wear face coverings or PPE will be considered on a case-by-case basis. It is the responsibility of the employee to notify their supervisor if they have a qualified medical condition and to provide supporting medical documentation to Company Human Resources as necessary.

California worksites only: Personnel must wear a mask, regardless of their status under the Company's Vaccination Verification Program, if they are in a room with personnel not certified status under the Company's Vaccination Verification Program or if anyone is exhibiting COVID-19 symptoms. Employees that are not fully vaccinated and that work indoors may also request respirators for voluntary use while at the workplace.

12.0 Equipment Use

Personnel shall not use other individuals' equipment, including phones, desks, offices, vehicles, weapons, radios, or other work tools when possible. When not possible, items must be sanitized both prior and after use with an [EPA approved](#) cleaning or disinfectant product. Disinfectant is provided throughout work areas for this purpose, along with cleaning instructions for specific equipment as required (such as copiers). Individuals who move or take cleaning supplies from a designated location will be disciplined. Employees who need additional disinfectant or cleaning products should contact their supervisor.

All contact surfaces of vehicles used by more than one person should be disinfected at the end of each person's use. All disinfectants are EPA-approved or otherwise comply with [CDC disinfection guidance](#).

This section also pertains to the use of pens; personnel should carry their own pens for use as needed.

13.0 Cleaning and Disinfection of Shared Areas

Employees are required to clean and disinfect any shared areas subsequent to use, to include break room tables, chairs, kitchen equipment, etc. and any equipment as set forth in Section 12.0. EPA approved cleaner/disinfectant is provided throughout these work areas for this purpose. Employees should contact their supervisor if they observe an area that may require additional cleaning and/or disinfecting or if Company provided cleaner/disinfectant is in need of replenishment.

All restrooms, common areas that remain in use, doorknobs/handles, tools, equipment, and other frequently touched surfaces should be disinfected before, in the middle of, and at the end of each shift. This includes “high touch points” in Company vehicles such as the steering wheel, door handles, seatbelts, armrests, and vehicle controls.

The Company will request that the client or Facility Manager clean and disinfect work areas of a known positive prior to allowing other employees access to the areas. Where feasible, a period of 24 hours will be observed prior to cleaning and disinfecting. This requirement shall not apply if the area(s) in question have been unoccupied for seven or more days.

14.0 Transportation

Unless all employees in the vehicle are certified under the requirements of the Company’s Vaccination Verification Program (*see* Section 16.0, below), if travelling together for work related purposes, personnel must ensure they travel no more than two employees per car (including the driver), three per SUV (including the driver) and four per van (including the driver). Personnel may not sit next to each other and are required to wear face coverings (e.g., surgical mask, cloth face covering etc.) while in the vehicle.

15.0 Travel

The Company adheres to all state and local COVID-19 travel restrictions, which may supersede direction provided within this section.

15.1 Business Travel

All non-essential business related travel requires a business case justification and Vice President level or higher approval. The only exception to this prohibition is for personnel returning to their Home of Record from an overseas deployment. Such travel shall only be approved if the individual can comply with all federal, state or local requirements and is approved by supervisory chain and the COVID-19 Task Force. Employees may not engage in business travel if they are sick, are suspected to have, or have been diagnosed with COVID-19 in the 10 days prior to travel (even if asymptomatic).

15.2 Personal Travel

Employees are responsible for reviewing current jurisdictional guidance prior to travelling for personal, non-business related reasons. Personal travel to certain locations may impact employee’s ability to report to work or otherwise perform services for the organization. Employees may use accrued leave in these situations, but are not otherwise eligible for any other reimbursement of lost time.

15.3 International Travel

Employees that engage in international travel for any reason to countries designated as [Level 3 or higher \(COVID-19 High Risk\) by the CDC](#) must quarantine for 14 days upon return to their country of departure. Employees may work from home during this period if authorized by their supervisor.

Employees may provide a negative COVID-19 test in lieu of quarantine, but the test may not be taken until at least the fifth day after return from travel.

Fully vaccinated employees (full series of a US FDA authorized vaccine, completed at least 14 days prior to travel) are exempt from quarantine after arrival. Employees must provide evidence of fully vaccinated status, such as a vaccine record, to their supervisor to be eligible for exemption.

Note that CDC designated risk levels are subject to change on a daily basis and employees are responsible for monitoring if they intend to take undertake international travel.

16.0 Vaccination Verification Program

Fully-vaccinated personnel participating in the Company's Vaccination Verification Program (the "Program") may be exempt from certain face covering and social distancing requirements when carrying out routine, day-to-day operations. *The Company's face covering and social distancing mandates will remain in effect for all personnel who are not fully vaccinated.*

For the purposes of this document, "fully vaccinated" is defined as at least 14 days subsequent to receipt of the second dose in a two-dose series (Pfizer-BioNTech or Moderna), or receipt of a single-dose vaccine (Johnson & Johnson/Janssen).

Note that implementation of the Program at the project or site level is subject to approval by the client and subject to restrictions as set forth in state/local ordinances.

16.1 Verification Process

Employees who are fully vaccinated must complete the Vaccine Verification Certification through the Constellis COVID-19 Portal or by completing the COVID-19 Vaccination Certification and Acknowledgment form (hard copy or online) with an approved Constellis representative. The COVID-19 Portal is a secure database allowing employees or managers to upload a copy of the employee COVID-19 Vaccination Card (or another form of acceptable documentation) and complete the COVID-19 Vaccine Verification Process. The following is considered valid proof of a COVID-19 vaccination:

- A copy of the record of immunization from a health care provider or pharmacy
- A copy of the COVID-19 Vaccination Record Card (CDC Form MLS-319813)
- A copy of medical records documenting the vaccination
- A copy of immunization records from a public health or State immunization information system, or
- A copy of any other official documentation verifying vaccination with information on the vaccine name, date(s) of administration, and the name of health care professional or clinic site administering vaccine

Vaccination information will not be maintained in any personnel files.

Note that employees should not ask questions or otherwise engage in conversations about an individual's decision to wear a face covering. Fully-vaccinated employees may continue to wear a face mask if they so choose. Employees may elect to continue to wear face coverings for multiple reasons, including when required by the Company and/or Customer, personal preference, recommendation of a health care provider, risk factors of members in their family or community, or having family members, including children, who are currently not eligible for vaccination.

16.2 Exceptions

The Company may still require face coverings for certain types of functions, to include large indoor meetings or other events where the CDC or state and local health departments have concluded vaccination status may not prevent the contraction or transmission of COVID-19. If such an event or meeting takes place, all employees or visitors, regardless of vaccination status, will be required to wear a face covering and/or adhere to social distancing requirements.

The Company may reinstate its face covering and/or social distancing mandate for fully-vaccinated employees at any time if the Company experiences an increase in incidents of COVID-19 at any location, if there are changes to jurisdictional requirements, and/or if community metrics no longer support the relaxation of face covering and social distancing requirements.

17.0 Communication

All relevant workplace reentry policies, procedures, and documentation will be posted to the COVID-19 SharePoint site. Relevant posters will be posted in common areas.

RELATED DOCUMENTS

- Supervisor COVID-19 Management Procedure
- Moyock Training COVID-19 Management Procedure
- National Capital Region Training Center COVID-19 Management Procedure
- ACADEMI NW and SE Training Centers COVID-19 Management Procedure

VERSION HISTORY

Version	Version Date	Author	Description
1.0	August 14, 2020	COVID-19 Task Force	Initial version; consolidates various communications
2.0	September 28, 2020	COVID-19 Task Force	Removed Section 5.1; revised Section 15, to include adding Section 15.3.
3.0	October 22, 2020	COVID-19 Task Force	Updated definition of "close contact" based upon revised CDC guidance.
4.0	November 25, 2020	COVID-19 Task Force	Corrected typo in Section 5.0.
5.0	January 08, 2021	COVID-19 Task Force	Removed references to various supervisor guidance documents and replaced with <i>Supervisor COVID-19 Management Procedure</i> ; added requirement to provide positive test result; added options in Section 7.2; various edits throughout.

Version	Version Date	Author	Description
6.0	January 22, 2021	COVID-19 Task Force	Added Note to Section 7.2.
7.0	April 15, 2021	COVID-19 Task Force	Revised Section 15.3 to include exemptions for vaccinated individuals.
8.0	June 19, 2021	COVID-19 Task Force	Added Section 16.0; added Note in Section 7.0; various edits throughout to reflect changes made in Section 16.0.
9.0	July 21, 2021	COVID-19 Task Force	Added language pertaining to California worksites.
10.0	December 28, 2021	COVID-19 Task Force	Updated COVID-19 Vaccination Verification Portal process and CDC isolation guidelines; Changed from Legal to HR Procedure