



Indian Trails, Inc. and Michigan Flyer, LLC

COVID-19 Preparedness and Response Plan

In accordance with the State of Michigan, Office of Governor Gretchen Whitmer, Executive Order 2020-59, Indian Trails, Incorporated and Michigan Flyer, LLC (together “Company”) institutes this COVID-19 (Coronavirus) Preparedness and Response Plan (herein referred to as “Plan”).

Company aims to protect its entire workforce by enacting all appropriate prevention efforts, while also continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate.

Employees with questions regarding this plan are encouraged to contact our designated COVID-19 Plan Coordinator, Jennifer Freeman, at 989.720.9357 or via email at jenniferf@indiantrails.com.

1. Prevention Efforts and Workplace Controls

a. Cleanliness and Social Distancing

Unless otherwise directed by a supervisor, employees who are able to perform their essential duties remotely may be permitted to work from home. To the maximum extent practicable, Company will provide the necessary tools and resources to accommodate those employees accordingly.

Only “critical infrastructure” workers performing necessary work that cannot be done remotely are directed to report on-site. Examples of these workers include drivers, mechanics, bus washers and cleaners, and some administrative staff. For such workers, Company abides by the recommended social distancing and other safety measures and establishes the following:

- Large gatherings are minimized whenever and wherever possible; any staff meetings as needed are to be held remotely via conference calls or video conferencing;
- Employees are strongly encouraged to maintain physical distance whenever possible, including when reporting to work, clocking in, within buildings or office spaces while working, when on break or lunch, when clocking out, as well as before and after working hours;
- Whenever and wherever possible, employees’ work stations should be no fewer than six feet apart;
- Employees must wear face coverings unless medically unable to tolerate them, or unless a minimum of six feet of social distancing can be maintained while on any company buses or within any company buildings.
- Company may use any number of options, including flexible work hours, to limit the number of employees simultaneously working within the same area at any given location and time;



- All company-owned facilities will remain on a “locked down” basis with access only allowed for employees and pre-scheduled and approved vendors as needed;
- All non-essential travel is postponed or canceled until further notice.

Company will provide all employees with, at a minimum, non-medical grade face coverings, as well as sanitary disposable gloves for drivers while on-duty. Employees will be allowed to use their own face coverings as long as they are not colored, branded or labeled in any offensive or conflicting manner to our customers or work associates.

In addition, Company is instituting the following additional measures for all company-owned buildings and buses, including but not limited to:

Buildings

- Where possible, increasing ventilation rates and circulation throughout work sites;
- Performing routine cleaning and disinfection, especially of common areas;
- Where available, providing hand sanitizer in high-traffic areas.

Buses

- Performing daily cleaning and disinfection with particular attention to commonly touched areas such as handrails, arm rests, and restrooms;
- General disinfectant spraying of entire interior of buses for additional sanitization;
- Providing hand sanitizer on all buses;
- Discontinue recirculation of air on all buses while only cycling fresh, outdoor air;
- Open roof hatches when weather permits to increase circulation of outdoor air through the cabin;
- Reducing capacity on all scheduled service buses and recommending reduced capacity on all charters;
- Providing protective barriers for drivers on all scheduled service and contract shuttle buses.

Employees are expected to minimize COVID-19 exposure by:

- Conducting self-monitoring of symptoms each day before reporting to work, including temperature checks if you suspect you may have a fever, and reporting to direct supervisors as soon as possible if you have any symptoms;
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms;
- Complying with self-isolation or quarantine orders;
- Cleaning individual work stations at the beginning and end of each shift;
- Avoiding, when possible, the use of other employees’ work spaces or equipment, including phones, desks, offices, and tools;
- Frequently washing hands with soap and water for at least 20 seconds;
- Utilizing hand sanitizer when soap and water are unavailable;



- Avoiding touching their faces with unwashed hands;
- Avoiding handshakes or other physical contact;
- Avoiding close contact with sick people;
- Practicing respiratory etiquette, including covering coughs and sneezes;
- Immediately reporting unsafe or unsanitary conditions on Company premises, including within buildings or on any buses.

b. Supplemental Measures Upon Notification of Employee's COVID-19 Diagnosis and/or Symptoms

An employee with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19, whether on company premises or off-site at the time, must report the symptoms immediately to his or her direct supervisor. Every effort will be made to relieve/remove that employee from duty immediately if on company premises, or as soon as safely possible if the employee is working off-site, such as a driver in the middle of an assignment on a bus.

In response to a confirmed diagnosis or display of COVID-19 symptoms, Company:

- Informs all employees with and near whom the diagnosed/symptomatic employee worked of a potential exposure;
- Keeps confidential the identity of the diagnosed/symptomatic employee; and
- Conducts deep cleaning of the diagnosed/symptomatic employee's workstation or bus/buses occupied, as well as any common areas potentially infected by the employee.

All employees who worked in sustained, close proximity to the diagnosed/symptomatic employee are also removed from service for at least 14 days; however, should these exposed employees later develop COVID-19 symptoms and/or receive a confirmed diagnosis, they may not report on-site until all return-to-work requirements are met as defined below.

Company will complete an OSHA Form 300, as well as a Form 301, "if it is more likely than not that a factor or exposure in the workplace caused or contributed to the illness." If an employee infects a coworker, the coworker has suffered a work-related illness if one of the recording criteria (e.g., medical treatment or days away from work) is met.

c. Worker Exposure Classification

Our employees' "worker exposure" is classified as medium risk by the Occupational Safety and Health Administration's guidance because they (drivers more specifically) frequently and/or closely interact with the general public.

Given this classification, Company will also install physical protective barriers on all scheduled service and contract shuttle buses (collectively, those buses serving the general public) to help separate the driver's area from the passenger area on those designated buses.



2. Identification and Isolation of Sick and/or Exposed Employees

Risk and exposure determinations are made without regard to employees' protected characteristics, as defined by local, state, and federal law.

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employees' personnel documentation.

a. Employees' Self-Monitoring

The following employees should **not** report to work and, upon notification to Company, will be removed from their regular work schedule:

- Employees who display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis;
- Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis; and
- Employees who, in the last 14 days, have had close contact with and/or live with any person displaying COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting.

Such employees may only resume in-person work upon meeting all return-to-work requirements as defined below.

b. Screenings

To prevent the spread of COVID-19 and reduce the potential risk of exposure, Company will begin screening employees within each department before they report to work each day. These screenings will be conducted by department heads or other designated individuals and may be done in person or electronically (particularly for employees reporting outside of company facilities, or in instances when a designated representative isn't available to conduct the screening). The screenings will include the following three questions:

1. Are you currently suffering from any of the following symptoms – fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting?
 - a. If a touchless thermometer is available, temperature checks may be performed.
 - b. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until employee is permitted to return to work as defined below.



2. Have you lived with, or had close contact with, someone in the last 14 days diagnosed with or displaying the symptoms of COVID-19?
 - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the close contact.
3. Have you traveled via airplane internationally or domestically in the last 14 days?
 - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the international or domestic travel.

Employees who develop symptoms during their shift must immediately report to their supervisor, at which time the supervisor will provide relief and remove the employee from their work as soon as possible.

c. Return-to-Work Requirements

Employees who were themselves diagnosed with COVID-19 may only return to work upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the non-test-based strategy.

The test-based strategy is preferred but relies upon the availability of testing supplies and laboratory capacity. Under this strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- Resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- Negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from two consecutive nasopharyngeal swab specimens collected at least 24 hours apart.

Under the non-test-based strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- At least 7 days have passed since symptoms first appeared.

Employees who came into close contact with, or live with, an individual with a confirmed diagnosis or symptoms may return to work after either 14 days have passed since the last close contact with the diagnosed/symptomatic individual, or the diagnosed/symptomatic individual receives a negative COVID-19 test.



Employees are typically required to submit a release to return to work from a healthcare provider; however, given the current stressors on the healthcare system due to COVID-19, Company may accept written statements from employees confirming all the factors supporting their release.

3. Workplace Flexibilities and Potential Benefits for Employees Affected by COVID-19

Employees directly affected by COVID-19 may be eligible for paid and/or unpaid leaves of absence, depending on the situation.

a. Families First Coronavirus Response Act (FFCRA)

Employees may qualify for two different types of paid leave under the Families First Coronavirus Response Act (“FFCRA”).

Emergency Paid Sick Leave Act (EPSLA)

Under the Emergency Paid Sick Leave Act (“EPSLA”), employees may seek up to two weeks (i.e., 10 business days) of paid leave for the following reasons:

1. Subject to a federal, state, or local quarantine or isolation order related to COVID-19;
2. Advised to self-quarantine due to concerns related to COVID-19;
3. Experiencing symptoms of COVID-19 and seeking a medical diagnosis;
4. Caring for an individual subject to a quarantine or isolation order or advised to self-quarantine due to concerns related to COVID-19;
5. Caring for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions; and
6. Experiencing any other substantially similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretary of the Treasury and the Secretary of Labor. (Please note, the Secretary of Health and Human Services has not defined conditions which trigger this subpart under the EPSLA.)

For full-time employees, two weeks of leave equates to 80 hours; for part-time employees, two weeks of leave equates to a number of hours equivalent to the number of hours usually worked in a two-week period.

Paid leave for reasons stated above in numbers 1, 2, and 3 is paid at the employee’s regular rate of pay. Paid leave for reasons stated above in numbers 4, 5, and 6 is paid at a rate equivalent to two-thirds of an employee’s regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

Emergency Family and Medical Leave Expansion Act (EFMLA)

Under the Emergency Family and Medical Leave Expansion Act (“EFMLA”), employees may seek up to twelve weeks of leave to care for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions. The first two weeks of leave, which run



concurrently with the EPSLA leave, may be unpaid; the remaining ten weeks of leave are paid at a rate equivalent to two-thirds of an employee's regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

b. Executive Order 2020-36

Employees who require leave beyond the EPSLA because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis/symptoms, may be eligible for unpaid leave under Executive Order 2020-36 until permitted thereunder to return to work.

c. Unemployment Compensation Benefits

Under Executive Order 2020-57, and the federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration for employees who are unable to report to work for reasons related to COVID-19. Such reasons include the following:

- Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
- Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath);
- Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
- Needing to care for someone with a confirmed COVID-19 diagnosis; and
- Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19).

d. Family and Medical Leave Act (FMLA)

Employees may be entitled to unpaid leave under the Family and Medical Leave Act ("FMLA") if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where "complications arise."

e. Americans with Disabilities Act (ADA)

Company is also mindful of its obligations under the Americans with Disabilities Act ("ADA"). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then Company engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.



4. Plan Updates and Expiration

This Plan was developed in response to the COVID-19 outbreak. As this pandemic progresses, Company will update the Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by Company and in accordance with guidance from local, state, and federal health officials.

Updated January 2021