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ROSE'S SOUTHWEST PAPERS, INC.

COVID-19: SURVEILLANCE & CONTACT TRACING PROGRAM PLAN

Background

On November 24, 2020, the New Mexico Departments of Health (“DOH”) and Environment (“NMED”) implemented a voluntary surveillance testing and contact tracing program to enable essential businesses to prevent mandatory 14-day closures triggered by the accrual of Rapid Responses the workplace. Rose’s Southwest Papers, Inc. (“Rose’s” or the “Company”) is deemed an “essential business” pursuant to the New Mexico Department of Health’s public health emergency orders and guidance as a manufacturer of sanitary paper products. Accordingly, this document outlines the key steps Rose’s shall implement to conduct surveillance testing of its employees for COVID-19 infections to perform contact tracing in the event of a positive COVID-19 case or exposure in the workplace.

Purpose

The health and safety of our employees, our customers and our community are Rose’s top priorities. To provide increased safety for our employees working on-site and to limit the potential transmission of COVID-19 inside or outside of the workplace, Rose’s shall implement this COVID-19 Surveillance & Contact Tracing Program Plan (the “Plan”). It is believed that in conjunction with other safety and cleaning prevention protocols already in place, voluntary surveillance testing and contact tracing will be effective in minimizing the number of positive cases of COVID-19 among our workforce and act as an additional safeguard as the spread of COVID-19 in our community becomes more and more prevalent.

Effective Date


December 1, 2020

Program Details

I. Surveillance

A. Diagnostic Testing


- a. Employees who work on-site, regardless of the number of hours or type of work performed, and who are not currently required to self-quarantine or self-isolate shall undergo bi-weekly diagnostic testing for COVID-19.

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- b. Testing results shall be provided to the employee and to Rose's.
- c. Test results will be used to determine whether an employee is eligible to remain or return to work or whether an employee must quarantine in accordance with NM DOH or NMED mandate.
- d. Testing shall either be conducted on site or at an offsite location identified by the Company by a private testing provider.
- e. If the employee is covered under one of the Company's health insurance plans with Blue Cross Blue Shield of New Mexico ("BCBSNM"), the testing shall be performed by a contracted provider with BCBSNM.
- f. If the cost of testing is not covered by an employee's health insurance provider, the testing shall be conducted at the Company's expense.
- g. The Company shall confirm that any diagnostic test administered to its employees shall be a test that is approved by the New Mexico Department of Health for the diagnosis of COVID-19.
- h. Prior to the administration of a diagnostic test by a provider, the Company shall ensure that the employee is provided with information on the purpose of the test, the type of the test, the reliability of the test and the manner in which the test will be administered.
- i. If an employee refuses to undergo diagnostic testing consistent with the procedures outlined in this Plan, the employee will be subject to disciplinary action, up to and including suspension or termination.
- j. Following the administration of a diagnostic test by a provider, the Company shall ensure that the employee is provided with information on how the test results should be interpreted.

B. Positive Tests

- a. *Self-Isolation.* Isolation separates sick people with a contagious disease – and, in the case of COVID-19, those with and without symptoms who have tested positive for COVID-19 – from people who are not sick. These people need to isolate themselves even from others in their own home. People with COVID-19 have the highest risk of spreading it to others and must be strict in their hygiene and physical separation from others. **An employee who tests positive**


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for COVID-19 shall self-isolate until he or she recovers from the disease (recovery is explained below). Self-isolation means a person is voluntarily isolating.

- b. *Recovery.*
 - i. Employees with COVID-19 symptoms who did NOT have severe illness or severe immunosuppression may end self-isolation only after:
 - At least 1 day (24 hours) has passed without a fever (and without the use of fever-reducing medications); **and**
 - The employee's symptoms have improved; **and**
 - At least 10 days have passed since the employee's symptoms first appeared.
 - ii. Employees with severe COVID-19 illness (i.e. hospitalized in an intensive care unit with or without mechanical ventilation) or with severe immunosuppression¹ may end self-isolation only after:
 - At least 1 day (24 hours) has passed without a fever (and without the use of fever-reducing medications); **and**
 - The employee's symptoms have improved; **and**
 - At least 20 days have passed since the employee's symptoms first appeared.
 - iii. Employees who tested positive for COVID-19 but NEVER developed COVID-19 symptoms can end self-isolation 10 days after the date the employee's test specimen was collected that resulted in the positive test. If the employee has a severe immunocompromising² condition without symptoms, the employee should wait at least 20 days after the date his or her test specimen was collected that resulted in the positive test before ending the self-isolation period.

¹ Severe immunosuppression includes being on chemotherapy for cancer, untreated HIV infection with CD4 T lymphocyte count <200, combined primary immunodeficiency disorder, and receipt of prednisone >20 mg/day for more than 14 days. Other factors, such as advanced age, diabetes mellitus, or end-stage renal disease, may pose a much lower degree of immunocompromise and not clearly affect decisions about duration of isolation.

² See FN 1.


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II. Contact Tracing

- A. Contact Tracing Explained. Contact tracing is a strategic tool generally used by public health personnel to prevent the further spread of infectious diseases like COVID-19. It involves working with a COVID-19 positive individual to remember and identify everyone with whom the individual had close contact during the timeframe during which they may have been infectious.
- B. Close Contact Explained. For COVID-19, a “close contact” is someone with whom a COVID-19 positive individual has spent 3 minutes or longer within 6 feet of one another during the COVID-19 positive individual’s “infectious period.” Additionally, a “close contact” is anyone (i) who had contact with the COVID-19 positive individual’s bodily fluids and/or secretions, or (ii) who shared a utensil or saliva with the COVID-19 positive individual.
- C. Infectious Period Explained. The “infectious period” for a personal infected with COVID-19 is the time during which the infected person is contagious and most likely to spread the disease to others.
 - a. People with Symptoms. For people with symptoms, the infectious period begins 2 days (48 hours) before the person experiences symptoms and extends 10 days after the symptoms first began, provided that there has been no fever for at least 24 hours without using fever-reducing medicines, and symptoms have resolved or improved.
 - b. People with Severe COVID-19 Illness. For those who have been hospitalized with COVID-19 in an intensive care unit with or without mechanical ventilation, or people with severe immunosuppression, the infectious period extends 20 days after the symptoms first began.
 - c. People Who Never Experienced Symptoms. The infectious period for a personal infected with COVID-19 who never had symptoms begins 2 days (48 hours) before the person’s positive test specimen was collected and extends 10 days after the collection date of the specimen.

D. COVID-19 Contact Tracing Team

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The Contact Tracing Team shall be responsible for supporting DOH contact tracing efforts within Rose's. The Contact Tracing Team shall familiarize itself with the contact tracing process, resources and regulations issued by NM DOH, NMED, the Centers for Disease Control and Prevention ("CDC") and any other guidance released by federal, state and local agencies, and it shall provide DOH with contact tracing data and information according to the State's protocols.

E. Contact Tracing Procedure

- a. Notification. Upon confirming a positive COVID-19 case within its workplace, but no later than four (4) hours thereafter, Rose's shall provide written notification to NMED's Occupational Health and Safety (OSHA) program of such positive case via the State's online reporting portal: <https://nmgov.force.com/rapidresponse/s/>.
- b. Isolation of the Work Area. Rose's shall immediately any work area(s) potentially contaminated by the infected employee in the 5 days preceding the date on which the positive COVID-19 case was confirmed. The work area(s) shall then be cleaned and disinfected in accordance with the then current CDC guidance.
- c. Tracing Protocols.
 - i. Interview.
 - Employees who test positive for COVID-19 shall be interviewed to determine if the employee had any "close contacts" within the workplace (i.e. specifically those employees with whom the COVID-19 positive employee came into contact within 48 hours from the date of the collection of a positive specimen, or, alternatively, the date of onset of symptoms), and to identify those "close contacts" that exist.
 - The Contact Tracing Team shall conduct the interview in such manner as to protect the privacy and confidentiality of the employee and his or her positive test results, as well as the safety of the Contact Tracing Team members. The Contact Tracing Team members should understand that the infected employee will be in a difficult situation and may likely be upset and scared. Care should be taken to avoid further


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aggravating the employee's mental state and to address the employee's questions and concerns to the extent possible. If the employee has questions that the Contact Tracing Team members cannot answer, the members should make every effort following the interview to find the correct answer and respond to the infected employee promptly.

- In conjunction with the interview, the Contact Tracing Team should review the employee's shift assignment and schedule to help determine any employees with whom the infected employee may have come into contact.
- ii. Instruction to Infected Employee to Self-Isolate. In accordance with Section I. B. above, the infected employee shall be asked to immediately self-isolate and contact his or her healthcare provider for further instruction.
- iii. Close Contacts.
- Notify Close Contacts Identified Through Interview (or Other) Process. Once an employee is confirmed to have COVID-19, or if the Company reasonably suspects that the employee is COVID-19 positive, the Company shall immediately contact the Close Contacts identified through the Interview or other process to inform them of the potential exposure.
 - Privacy/Confidentiality. The identity of the COVID-19 positive employee shall not be disclosed to protect his or her privacy and confidentiality.
 - Self-Quarantine. The Close Contact should be instructed to self-quarantine for a period of fourteen (14) days from the date of the last contact with the infected employee. The Close Contact may or may not have contracted the disease, and the 14-day quarantine period is necessary to ensure the Close Contact does not further spread the disease if infected.

III. Confidentiality/Privacy.

Except for circumstances in which the Company is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential

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for transmission to others. The Company reserves the right to inform other employees that an unnamed co-worker has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health. The Company also reserves the right to inform sub-contractors, vendors/suppliers or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

IV. General Questions

Rose's may modify this Plan based on future developments in the recommendations of the New Mexico Department of Health, New Mexico Environment Department, the Occupational Safety and Health Administration the Centers for Disease Control and Prevention, or other federal, state or local authority or guideline. If you have any questions concerning this Plan, please contact either Myriam Ramos, Human Resources Manager, or James La Fata, General Counsel & Administrative Officer.