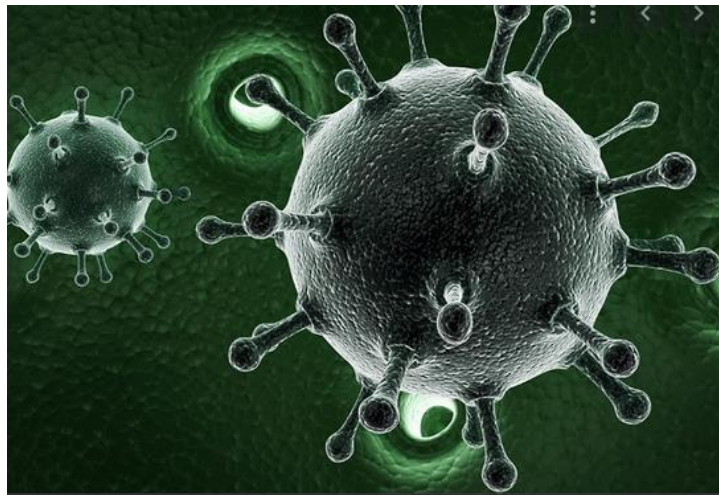


Pandemic Response Plan



Revision 8.0 June 25, 2021

Blarney Castle Oil Co.

Blarney Castle
OIL & PROPANE



EZ Mart
The Blarney Castle Family of Stores

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1. SCOPE

This plan describes the measures Blarney Castle Oil Co. is taking to safely work and provide essential services as well as preserve the continuity of our operations during the ongoing COVID-19 pandemic. The Response Plan is to be used as an Essential Worker / Critical Infrastructure company guide which aligns with Michigan Department of Health and Human Services (MDHHS) orders, Michigan Occupational Safety & Health Administration (MIOSHA) emergency rules, and guidelines from the Centers for Disease Control and Prevention (CDC) and World Health Organization (WHO) where possible.

The Response Plan provides general recommendations for use in all company facilities. Because there may be circumstances unique to a location, there may be some cases in which a facility must adapt guidelines to address a specific requirement. Such exceptions must be authorized by senior leadership.

This is a working document and will be updated to reflect changes in directives and introduce new recommended practices as they become available.

2. DEFINITIONS

CDC - Center for Disease Control

COVID-19 – Commonly known as Coronavirus, is a highly contagious illness that can affect lungs and airways.

CLOSE CONTACT – within 6 feet for at least 15 minutes or more in 24-hours

ISOLATION – Once tested positive or medically deemed probable due to symptoms, to remain at home until safely able to meet CDC criteria for return

MDHHS – Michigan Department of Health and Human Services

MIOSHA – Michigan Occupational Safety and Health Administration

PPE – Personal Protective Equipment

QUARANTINE –waiting period to see if any symptoms develop, following possible exposure

SYMPTOMS RESOLVED – All listed COVID-19 symptoms are gone or greatly improved, with the exception of Loss of Taste or Smell, which can last weeks or months, but should not impact return to work.

WHO – World Health Organization

3. COVID-19 SYMPTOMS

Principal symptoms:

- Fever,
- Uncontrolled, or abnormal cough for you,
- Shortness of Breath or Difficulty Breathing
- Loss of Taste or Smell
- Unusual fatigue
- Muscle or body aches
- Sore throat
- Severe headache, or abnormal for you
- Congestion or runny nose
- Diarrhea
- Vomiting
- Abdominal Pain

In more severe cases, infection can cause pneumonia, severe acute respiratory syndrome, kidney failure and even death.

Be suspect of symptoms that are unusual, abnormal, unexplained, changing or worsening.

4. DISEASE TRANSMISSION

COVID-19 is transmissible by respiratory secretions such as saliva or mucus. Infected individuals can spread it by introducing the virus into the air, which can then be inhaled by other individuals nearby. Though not definitive, there is also concern that COVID-19 may be transmitted by touching a surface or object that has the virus on it and then touching your mouth, nose or eyes. For these reasons, people are advised to cover their cough, wash their hands with soap and water for 20 seconds or use hand sanitizer with a minimum of 60% alcohol. Frequently touched surfaces should be routinely cleaned and disinfected more frequently to prevent transmission of the disease.

The CDC supports the emergency authorized COVID vaccine to reduce an individual's risk of contracting the virus, and/or reduce the severity of the symptoms if contracted. The CDC also recommends "social distancing" to reduce transmission of the virus through the air via saliva or mucus by physically maintaining a distance of 6 feet from another person. By maintaining a proper "social distance" from others, we can prevent transfer of the virus when someone coughs, sneezes or speaks. Additionally suggested are physical barriers (plastic or glass dividers) and Personal Protective Equipment (face coverings and shields) to reduce possible risk of virus transmission.

5. RESPONSE TEAM

- a. Blarney Castle Oil Co. senior management meets as needed to monitor the changing practices and guidelines pertaining to COVID-19, including the current recommendations from Federal, State and Local government officials.
- b. Human Resources will be the lead on a cross functional team of participants that includes: Ownership, Convenience Store Operations, Petroleum Operations, Safety & Risk, Finance and Facilities & Maintenance.
- c. The following location leadership will be the responsible lead for their functional areas.

Petroleum Operations - Branch Managers

Convenience Stores - Store Managers, Assistant Managers and Deli Managers for each specific convenience store location and function

Home Office - Human Resources and Risk/Safety

- d. The above leads will be responsible for the following:
 - Timely direction of communications, policies and training of new procedures.
 - Ensuring social distancing environment for employees and visitors
 - Ensuring proper PPE is available for all employees and training in use provided
 - Ensuring preventative materials (cleaning, sanitizing and disinfecting products) are stocked and available
 - Conducting daily health screenings of employees in those locations with visitor/public access, when Emergency Orders require.
 - Communication with Human Resources on all failed screenings, reports of self-quarantines and positive testing results of employees
- e. The response team will continue to evaluate the effectiveness of the COVID-19 response protocols. Adjustments will be made to correct deficiencies in protocols as new experience is gained or guidelines are updated.

6. RISK LEVEL IDENTIFICATION

The following identifies functions within Blarney Castle Oil Co into recognized MIOSHA COVID-19 risk categories. The Company, in its entirety, is deemed Critical Infrastructure based on sale and distribution of Food Services and Energy Services, and transportation of those services. Due to the services provided by Blarney Castle Oil Co, we will follow the CDC guidelines for Critical Infrastructure / Essential Workers.

- a. The Petroleum Operations, having minimal public and co-worker exposure, is determined to be Lower Exposure Risk.
- b. The Convenience Store Operations, comprising of public retail for the sale of food products and fuel, and limited ability for co-workers to social distance, is determined to be Medium Exposure Risk.
- c. The Office environments, having minimal public and co-worker exposure, is determined to be Lower Exposure Risk.

7. GENERAL CONTROL MEASURES

The following measures are currently implemented by BCOC:

- a. Implement all applicable CDC guidelines, including social distancing and hygiene measures.
- b. Purchase and distribution of CDC advised PPE (Personal Protective Equipment) and directions for proper use to all active employees.
- c. Limit the number of participants for in-person meetings based on local guidelines and orders.
- d. Reduce frequency of in-person meetings whenever possible through use of telecommunications.
- e. When Emergency Orders are in place, identify staff who may be at high risk for COVID exposure, offer work-from-home if possible, or place on temporary leave of absence.
- f. Implement temporary leave of absence option for employees impacted by State or Federal childcare closures in accordance with State or Federal orders.
- g. Identify staff who may complete duties from home and allow work-from-home option in accordance with State or Federal orders.

- i. Petroleum Operations
 - 1. Due to system limitations and hard record keeping, branch functions need to be in-person.
 - 2. Critical Functions identified above for Maintenance, Drivers, and Delivery personnel must be in-person.
- ii. Convenience Store Operations
 - 1. Store employees and managers must work in-person.
 - 2. Store Area Managers and Directors may perform some duties remotely, and should when feasible.
- iii. Home Office Operations
 - 1. Those employees with both system and hardware ability to work remotely will do so during Emergency Orders.
 - 2. Reduced work days in the office has been implemented where feasible to lessen count of staff in the building, while Emergency Orders are in place.
 - 3. Due to system limitations and hard record keeping, some office functions need to be in-person.
- h. Encourage staggered shifts and/or break times to allow social distancing when this is not achievable due to space limitations.
- i. Suspension of all non-essential business travel, when such restrictions are ordered.
- j. Conduct screening questionnaire for all visitors prior to facility entry and prohibit if exhibiting signs of illness as described by COVID-19 symptoms. Outside visitor access may be reduced to essential business only or eliminated depending on degree of Emergency Orders.
- k. Educate on the importance of Daily Health Screening questions, encouraging employees to not report to work when ill. Require documented screening logs when Emergency Orders dictate.
- l. Evaluation of employees returning from illness.
- m. Evaluation of employees returning from or travel, when such restrictions are in place.

- n. Inform employees to stay home if they are sick, and intervention with those who display symptoms at work.
- o. Timely reporting of all COVID positive employee cases to appropriate health departments as directed during Emergency Orders.
- p. Enhanced scheduled cleaning and sanitization of all work and common areas, following company cleaning protocols.
- q. Strict adherence to customer requirements at their facilities (Dealer locations and commercial accounts).
- r. Posting virus mitigation and prevention materials throughout the facilities, and CDC recommended hand-washing signage near sinks.
- s. Request from regular vendors and suppliers they have response plans in place and their employees visiting our facilities will adhere to their plans.
- t. Utilization of a variety of communication methods to keep employees informed of changing requirements, including company-wide emails and site specific policy changes.
- u. Re-arrange work stations to allow for at least 6-foot spacing and walled barriers where possible in office settings.

The following are to be followed by Employees:

- a. Do not come in to work if you are sick.
- b. Employees who have been confirmed to have COVID-19 are required to call in their diagnosis to their supervisor and provide documentation of result.
- c. Supervisors are to immediately report confirmed cases of COVID-19 to Human Resources.
- d. Work at distances greater than 6 feet where able or implement engineering controls to maintain separation.
- e. Truthfully answer all health screening questions for the safety of your co-workers.
- f. Do not share office spaces, tools and equipment whenever possible. If shared use, sanitize items per CDC cleaning recommendations.
- g. Clean and disinfect break areas and kitchens regularly with disinfectant.
- h. Regularly disinfect doorknobs, chairs, keyboards, pens and phones.

8. PREVENTATIVE MATERIALS

Confirm each location has a recommended 30-day supply of:

- Soap, hand sanitizer, tissues and paper towels
- Cleaning and disinfecting products provided that meet CDC guidelines, wipes and towels

9. PERSONAL PROTECTIVE EQUIPMENT (PPE)

Confirm that the following items are available for all employee at each location, maintain the recommended 30-day supply, and have additional inventory on hand for returning employees.

- Face masks, washable and re-usable
- Nitrile gloves
- No touch, digital thermometer
- Face-shields

10. SOCIAL DISTANCING PROTOCOL

Social distancing is a simple yet effective practice to prevent potential infection, which relies on simple distance to avoid infection.

- a. Staying six (6) feet away from others as a normal practice
- b. Eliminating direct contact with others, such as handshakes or embracing coworkers, visitors or friends
- c. Avoid touching surfaces touched by others, to the extent possible
- d. Avoid anyone who is coughing, sneezing, or appears to be sick
- f. Where minimal distancing of 6 feet cannot be maintained, mitigation steps such as PPE will be provided. Face coverings should be worn and gloves are available. Frequent hand washing or sanitizing are advised.
- g. In office settings, desks or work stations should be arranged for optimal distance, and employees should disinfect their work areas frequently.

- h. Lunch/break areas should allow spaced seating, and it is recommended that start and end times be staggered to limit the number of people in those common areas.

11. DISINFECTION MEASURES

Providers or employees should sanitize and disinfect all areas of the site with special attention to:

Equipment, special attention to printers and copiers	At least daily, or after long use
Tools and equipment	After personal use, before shared with another or daily
Workstations and cubicles	Daily
Restrooms	Periodic cleaning during the day then thorough cleaning daily.
Commonly used surfaces, conference tables, counters, door handles and light switches	Periodic cleaning during the day, after any meetings, then thorough cleaning daily.
Computer screens and keyboards	Daily
Breakroom: tables, chairs and microwave	At the end of each day, and after use.
Transport, fuel delivery, maintenance and company vehicles	At the end of each user shift and as needed based on tasks performed

12. INBOUND PACKAGES AND MAIL

- a. According to the WHO, it is safe to receive packages from areas where COVID-19 has been reported. “The likelihood of an infected person contaminating commercial goods is low, and the risk of catching the virus that causes COVID-19 from a package that has been moved, traveled and exposed to different conditions and temperature is also low.”
- b. Home office and warehouse delivery receipt protocols have been adjusted to limit access of visitors inside of the buildings. Packages may to be left at the front desk or warehouse for distribution by employees.
- c. If an employee is concerned about possible surface contamination consider these steps:
 - Wash your hands frequently with soap and water
 - Use hand sanitizer if unable to wash with soap and water
 - Avoid touching your face, eyes, nose and mouth
 - Using PPE, such as nitrile gloves to handle
 - Disinfect any surfaces package may have touched

13. HEALTH SCREENING

- a. If an employee exhibits symptoms consistent with a contagious disease (germ or virus), the employee should not report for in-person work and immediately contact their supervisor.
 - See Section 3 for current known symptoms of COVID-19.
 - In the absence of Emergency Orders and Rules, Blarney Castle Oil Co.’s current absence/sick policy applies.
 - If additional symptoms present or symptoms persist, it is suggested the employee seek medical advice or be tested for COVID-19.
 - If employee submits a doctor slip supporting a known medical cause, non-COVID or other non-infectious medical reason they may return.

14. ISOLATION PROTOCOL & COORDINATOR TRAINING

Isolation protocol for employees who become ill at work: if a person feels ill or if someone observes that another person is exhibiting symptoms of COVID-19 at work, immediately contact the appropriate location lead identified in section 5.2.1 above.

- a. Employees displaying symptoms while at work need to immediately be isolated from co-workers. Location lead will follow the procedure below for assisting an employee with COVID-19 symptoms while at work.
 - i. Due to the limited size of many of our locations, the isolation protocol will be to have them leave the store to distance from co-workers, employee's vehicle is reasonable.
 - ii. If in a larger location, the isolation room should be an enclosed area away from general population of employees and customers.
- b. The employee will need to immediately wear a face covering if not already and should be given nitrile gloves to wear to limit contact.
- c. Location Lead, wearing face covering and nitrile gloves, will document symptoms for Human Resources and assist employee if needed in contacting medical assistance for guidance on transportation and illness.
- d. Lead will assist the ill employee to leave work and go home or go to the nearest health care facility. Public transportation should not be used.
- e. If the individual is well enough to drive their own vehicle, they may be sent home.
- f. A family member or friend may be called to pick up the employee, ensure the individual continues to wear a face covering and gloves, and remains isolated until assistance arrives. Proper mitigation precautions should be taken by driver.
- g. If professional medical transport is advised, ensure the individual continues to wears the face covering and gloves, and remains isolated until professional medical assistance arrives.
- h. Human Resources and the Location Lead may suggest the individual to seek medical attention or COVID-19 testing to verify case.
- i. Should the employee test positive for the virus, the Company will follow procedures for "Positive Test Results for COVID-19 of an Employee" in section 15.
- j. Ensure that both the isolation area and employee's work areas are thoroughly cleaned and disinfected, in addition to all other common surfaces recently touched by the suspected infected employee. All persons carrying out this cleaning must wear disposable nitrile gloves and all PPE must be discarded prior to resuming normal work functions.
- k. If a positive test is confirmed, follow Company cleaning protocols.

15. POSITIVE TEST RESULTS FOR COVID-19 OF AN EMPLOYEE

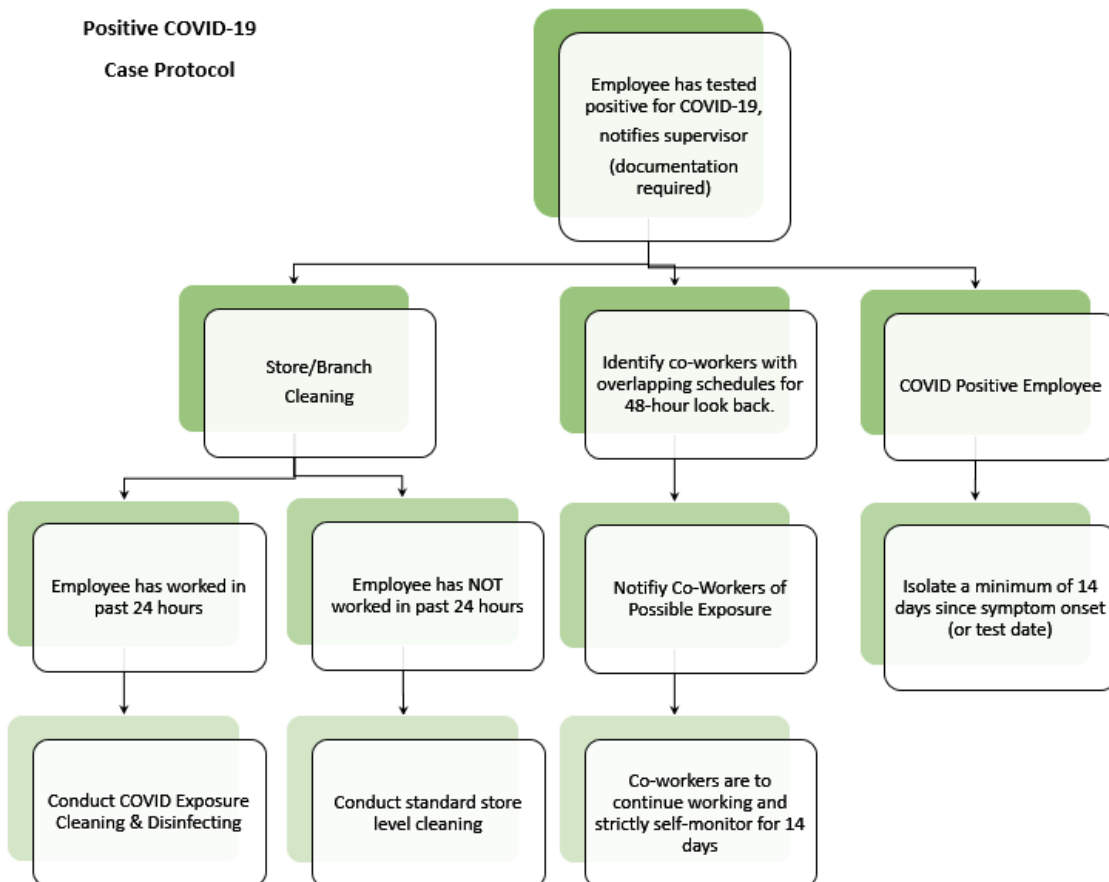
- a. Notifications, when an employee notifies (preferably by phone) their supervisor or co-workers of a positive test for COVID-19, that information must be reported immediately to their respective lead (Area or Branch Manager).
 - Proof of the test results are required
- b. The Area/Branch Manager will immediately notify the following:

Convenience Stores

 - Director of Retail Sales - for C-store coordination and guidance. Internal communications to transport, dispatch, maintenance and others on store closure as necessary.
 - VP of Retail Sales - for vendor coordination, following their required timeframe.
 - Petroleum Operations
 - VP of Petroleum Operations
- c. Safety/Risk (Janet Gomez) - COVID protocol, cleaning and health department guidance
- d. Human Resources (Joan Cramer) – contact tracing, co-worker(s) notifications, employee leave administration and guidance
- e. Facility Cleaning - The store/office staff will follow cleaning protocols below.
 - If it has been 24 hours or less since the COVID-19 positive employee has been in the workplace the location will receive localized COVID Exposure cleaning and disinfecting.

COVID Exposure Cleaning is an additional cleaning and disinfecting process performed by location staff that would involve both cleaning and disinfection of all touch points and common spaces impacted by both co-workers and customers, with special attention placed on areas directly used by positive individual.
 - If it has been 25 hours or more since the COVID-19 positive employee had been in the workplace, the building should continue standard cleaning and disinfecting per CDC guidelines.

- f. Employee Tracing - Per CDC guidelines the timeline for having contact with a COVID-19 positive individual includes the period of time of 48 hours before the individual became symptomatic or the date of the test that yielded positive results for asymptomatic persons.
 - A 48-hour lookback will be done based on above protocol, and anyone determined to have had close contact with the infected co-worker will be notified of the potential exposure.
 - Pursuant to CDC guidelines for Critical Infrastructure and Essential Workers, employees will, if no symptoms present, continue to work regular duties and strictly and frequently monitor for, and report if any symptoms develop.
 - Should symptoms develop, follow Health Screening protocols in section 13.
- g. Managers will need to maintain positive employee’s regular schedule in Kronos during the isolation period.
- i. See decision tree



06-25- 2021

16. QUARANTINE / ISOLATION AND RETURN TO WORK PROTOCOLS

Employees who are requested to remain off work per the guidance in the “IF THEN” scenarios should:

- If you seek medical attention or testing, call ahead to ensure you follow necessary precautions.
 - Wear a face covering to protect others
 - Limit contact with members of your household and visitors
 - Stay in your home, make arrangements for food and medications you may need with little to no contact with others.
 - Continue to monitor your symptoms, if they worsen, it is suggested you call a health care provider.
 - Cooperate with local health departments in conducting contact tracing.
- a. An employee who is fully vaccinated (have received a vaccination, and it has been more than two-weeks since second shot or initial shot if single dose), will be exempt from the need to quarantine, providing they remain symptom free.
 - b. An employees who has had COVID-19 within the past three months will be exempt from the need to quarantine, providing they remain symptom free.
 - c. An employee with positive test results for COVID-19 may discontinue isolation, and return to work when all three of the following apply.
 - No fever for 24 hours (with no fever reducing medications) **AND**
 - Minimum of 10 days have passed since symptoms first appeared or for asymptomatic, test date that yielded positive results, **AND**

When calculating days for isolation, use day of symptom(s) onset (or if asymptomatic the day the test was taken), consider that day zero, count forward ten (10) days, employee may return on the 11th day. Note, if health department or medical provider advises you otherwise, please communicate this with HR.

- Other symptoms resolved

17.EMPLOYEE TRAINING

- Convenience store staff will be assigned the RTO video on COVID-19 and will be required to watch and complete quiz.
- Periodic communications from Company ownership on status of the business situation in relation to pandemic.
- Email distribution from Human Resources and Operations on new procedures as they develop.
- Continued improvements to Response Plan as recommendations and directions are released.
- Posting of CDC guideline posters addressing:
 - Hand washing techniques
 - Recommended PPE and proper use/wear of PPE

18.EMPLOYEE WELLNESS & ASSISTANCE

- All employees should carefully review this response plan and follow guidelines accordingly.
- If employees have any questions or concerns related to COVID-19 they may be directed to Human Resources or Risk.
- **If an employee feels sick, they should not report to work but call to let supervisor know**, it is suggested they seek appropriate medical care to determine the next steps in testing or medical care prior to visiting a hospital, urgent care or doctor's office. In an emergency contact 911.
- Notify your supervisor of your medical situation (via phone call), and keep them informed daily.

19.IF, THEN Guide Sheet (dated 06-24-21)

Updated 06/24/2021				
"The principal symptoms of COVID-19" are any one of the following not explained by a known medical or physical condition: fever 100.4 or greater, an uncontrolled or abnormal cough for you, shortness of breath or difficulty breathing, loss of taste or smell, unusual fatigue, muscle or body aches, sore throat, severe headache that are abnormal for you, congestion or runny nose, diarrhea, vomiting, or abdominal pain.				
IF	Then	How to Code in KRONOS	Benefits While Off Work	
1 If an employee exhibits symptoms consistent with a contagious disease.	The Employee should not report for in-person work. Current BCOC Absentee/Sick policy applies.	The employee should enter a time off request however, in the absence of the request the manager should enter earned time off as follows: 1st-PMILA, 2nd-Personal, 3rd- Vacation time. If no benefit time is available, absence will be unpaid.	Benefits would continue through payroll deduction.	
2 An employee has had contact with a person outside of the company that has tested positive for COVID-19 and employee has followed social distancing of 6 feet or greater.	Can continue working and self-monitor for any symptoms. If any symptoms develop do not come into work and promptly notify your manager. See #1 above.	N/A	N/A	
3 An employee has had contact with a person outside of the company that has tested positive for COVID-19 and employee has <u>NOT</u> followed social distancing of 6 feet or Greater for more than 15 minutes.	Can continue working and self-monitor for any symptoms. If any symptoms develop do not come into work and promptly notify your manager. See #1 above.	N/A	N/A	
4 An employee has had close contact, less than 6 feet apart for 15 minutes or greater, while at work with a co-worker who has tested positive for COVID-19.	Can continue working and self-monitor for any symptoms. If any symptoms develop do not come into work and promptly notify your manager. See #1 above.	N/A	N/A	
5 An employee lives in a home where a family member or anyone staying in the home has tested positive for COVID-19.	Can continue working and self-monitor for any symptoms. If any symptoms develop do not come into work and promptly notify your manager. See #1 above.	N/A	N/A	
6 An employee tests positive for COVID-19.	Employee will remain off work: Minimum of 10 days since the symptom onset (or test date if asymptomatic) AND No fever for more than 24 hours (without the use of fever reducing medication), AND Other symptoms diminish OR Employee can submit documentation medically cleared by a doctor/health department. Employee is to call/text manager with updates. *Manager should not identify the name of the employee to ensure compliance with privacy laws.	Upon receipt of medical documentation confirming the POSITIVE case, the employee will be paid their normally scheduled time for the 10 day Quarantine period (up to 40 hours per week). Manager should maintain Employees regular schedule and enter the In/Out punch times on the employees timesheet. Then add an additional line to the timesheet to record the QUARANTINE time. See instruction sheet link below. Contact Joan Cramer to communicate ANY changes to the return to work date.	Benefit time will continue through payroll deduction.	

Updated 06/24/2021			
"The principal symptoms of COVID-19" are any one of the following not explained by a known medical or physical condition: fever 100.4 or greater, an uncontrolled or abnormal cough for you, shortness of breath or difficulty breathing, loss of taste or smell, unusual fatigue, muscle or body aches, sore throat, severe headache that are abnormal for you, congestion or runny nose, diarrhea, vomiting, or abdominal pain.			
IF	Then	How to Code in KRONOS	Benefits While Off Work
7 Employee receives notice of self-quarantine from a health department	Employee is to follow health department recommendations and notify HR and manager of receipt of notice. *Manager should not identify the name of the employee to ensure compliance with privacy laws.	Code their time in KRONOS. If they have benefit time, enter into their timesheet. 1st-PMLA, 2rd-Personal, 3rd- Vacation time. Legacy Sick is not to be used. if no benefit time is available, absence will be unpaid.	N/A
8 Employee Travel - Domestic/International	Must follow CDC Guidelines for Safe Travel. Can continue working and self-monitor and immediately report ANY symptoms to their Manager/HR, and complete the Health Screening Log. *Employee should research, before leaving, the state they are traveling to doesn't require a self-quarantine once they arrive.	N/A	N/A
9 Employee is not comfortable working due to COVID-19.	CDC COVID-19 Travel Tips.pdf Due to the lifting of the Stay Home - Stay Safe order, this is no longer applicable.	N/A	N/A
10 Employee Develops Symptoms after receiving the COVID vaccine or booster.	With proof of vaccination, the employee absence is considered excused for up to 48 hours. With symptom improvement the employee should return to work. If there is no symptom resolution after this two-day window, a doctor's slip, authorizing safe return to work, will be required. *Manager should not identify the name of the employee to ensure compliance with privacy laws.	Code their time in KRONOS as QUARANTINE. If they have benefit time, enter into their timesheet. 1st-PMLA, 2nd-Legacy Sick, 3rd-Personal 4th-Vacation time. If they have legacy sick please contact Joan Cramer by email and she will apply it. If no benefit time is available, absence will be unpaid.	Benefits deductions would continue through payroll deduction.

20.0 MORE INFORMATION

- All Blarney Castle Oil Co. COVID documentation and support materials can be found in Shared Folders in the Safety > COVID subfolder.
- <https://www.michigan.gov/Coronavirus>
- <https://www.cdc.gov/coronavirus/2019-nCoV/index.html>
- Call the COVID-19 Hotline at 888-535-6136 (7 days a week from 8 a.m. to 5 p.m.)
- Email covid19@michigan.gov 24/7