

 <p>P & H Milling Group A division of Parrish & Heimbecker, Limited</p>	HEALTH, SAFETY & ENVIRONMENT	DOC #:	HSE.033.A.00.E
		Effective Date:	2020-03-16
	Pandemic Response Plan	Status:	Active
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1. Purpose

- 1.1. The purpose of this policy is to provide guidance leading up to and during a threat or outbreak of a pandemic event.
- 1.2. The activities outlined in this policy prepare the sites to continue with critical operations during a pandemic event or other significant business disruption.

2. Scope

- 2.1. This policy applies to all P&H Milling Group employees at all PHMG facilities and operations.

3. Responsibility

3.1. President and CEO

- 3.1.1. Take reasonable steps to ensure the active management in measuring the sites health and safety performance as it relates to Business Continuity and Pandemic Planning.

3.2. Senior Leadership Team

- 3.2.1. The President / CEO will lead the team and ensure that continuity activities are coordinated and communicated to the Board. Some of these activities will include:
 - 3.2.1.1. Monitoring of global situation and continually assessing the scale of the outbreak.
 - 3.2.1.2. Escalate/de-escalate pandemic or continuity activities.
 - 3.2.1.3. Ensure that information is shared consistently to the Operations Manager at each site.
 - 3.2.1.4. Assist the sites in their continuity or pandemic planning (site shut down, isolation, travel, shift production etc.).
 - 3.2.1.5. Monitor global impact to all P&H Milling sites and report to Board.

3.3. Operations Managers

- 3.3.1. Ensure that all site actions are coordinated and consistent with the direction and activity of the Senior Leadership Team.
- 3.3.2. Assemble a team that will manage all site level requirements (Pandemic Site Coordinator, Site Safety Administrator, Health and Safety Manager, Supervisors, WHSC, union, etc.).
 - 3.3.2.1. Conduct a round table discussion, evaluating operational readiness in the following areas:
 - 3.3.2.1.1. Identification of critical inputs (raw material, suppliers, sub-contractors services/products, and logistics) required to maintain operations.
 - 3.3.2.1.2. Identification of critical positions/tasks. Train and prepare an ancillary workforce to fulfil the critical positions should are workforce be reduced due to illness.
 - 3.3.2.1.3. Identification of personal hygiene requirements to reduce/minimize infection at the site (hand sanitizer, respirators, first aid room to isolate sick employees).
 - 3.3.2.1.4. Ability to implement some social distancing principles at the site.
 - 3.3.2.1.5. Technical ability to allow critical positions to work from home.
 - 3.3.2.1.6. Communication infrastructure that promotes consistent and accurate information sharing with employees (sick procedures, visitor policies, human resource policies, shift changes etc.).
 - 3.3.2.1.7. Consideration of increased rigour in quality procedures, as it relates to food safety.

3.4. Supervisors

- 3.4.1. Supervisors have the front-line responsibility to take all reasonable steps necessary to ensure their employees understand and are compliant to the Business Continuity and Pandemic Planning procedures.

3.5. Employees

3.5.1. Adhere to the Business Continuity and Pandemic Planning procedures.

3.5.2. Report any deviation of the Business Continuity and Pandemic Planning procedures to their supervisor.

4. Policy Guidelines

4.1. Prevention and Response

4.1.1. These activities prepare the sites to prevent exposure and to reduce transmission of virus by implementing education and hygiene programs.

4.1.2. In addition, Human Resource strategies are outlined that help manage the workforce through a pandemic or other significant business disruption including cross training employees.

4.2. Minimizing Risk in the Workplace

4.2.1. Enhanced hygiene & infection control measures

4.2.1.1. Mandatory handwashing as per GMP

4.2.1.2. Use of hand sanitizers when soap and water is unavailable following the use of biometric scanners

4.2.1.3. Increased frequency of office and station cleaning in addition to the use of disinfecting wipes on biometric scanners, iLobby units, desks, keyboards/mouse, door handles, etc.

4.2.1.4. Do not share pens, staplers etc.

4.2.2. Social distancing strategies

4.2.2.1. Initiate work from home policies where possible.

4.2.2.2. Stagger shifts to reduce the number of employees on site at any given time.

4.2.2.3. Stagger breaks/lunch periods to reduce the number of employees in our common areas at any given time.

4.2.2.4. Define and exclude non-essential visitors to site.

4.2.2.5. Substitute teleconferences for face-to-face meetings.

4.2.2.6. Discourage hand shaking.

4.2.2.7. Control areas where incidental office visitors come (delivery, couriers, salespeople)

4.2.2.8. Limit need for company travel.

4.2.2.9. Shipping/receiving protocols that restrict human-to-human contact between independent drivers and warehouse employees.

4.2.2.10. Surveying of customers to ensure that protocols reduce/restrict human-to-human contact between our truck drivers and customer employees.

4.3. Tracking Suspected and Confirmed Cases

4.3.1. All P&H Milling Group sites will track cases that meet the WHO/Public Health Canada case definition. Cases may include pandemic-related illnesses and absenteeism due to an employee being in a caregiver role.

4.3.2. Prompt and accurate reporting of influenza cases to the Site Coordinator is important in monitoring and controlling outbreak within PHMG.

4.4. Response to Potentially Infected Employees

4.4.1. Human Resource policies, including absenteeism, medical leave and return to work, will need to be reviewed and modified during a pandemic outbreak.

4.4.2. Temporary measures need to be considered that encourage early reporting of symptoms and discourage a return to work by potentially contagious or sick employees.

4.4.3. Employees who suspect personal infection and/or have family members who are infected are encouraged to remain at home in isolation during the incubation period.

4.4.4. If an employee confirms symptoms of influenza while on shift they must inform their supervisor immediately.

4.4.4.1. Each site should identify an area where these employees can comfortably remain isolated until they can be picked up by family members or other transportation arranged.

4.5. Traveling

4.5.1. During Phase 6 of the WHO Alert Phase system, all business travel (International and National) will need to be approved by the President / CEO.

4.5.2. Travel restriction should be determined based on the best available information regarding outbreaks in the destination areas.

4.5.3. Personal travel should also be considered and identified risks and precautions communicated.

4.6. Communication

4.6.1. These activities prepare the sites to engage in trusted, reliable and accurate information about pandemic outcomes.

4.6.2. Sites should develop and maintain a list of internal and external key contacts.

- 4.6.3. During wide spread infection, each site should develop communication platforms that will allow the sharing of accurate and consistent information to employees, suppliers and customers (hotlines, intranet, and extranets).
- 4.6.4. A communication board should also be identified where pertinent information will be routinely updated and may include the following:
 - 4.6.4.1. How influenza is transmitted.
 - 4.6.4.2. Incubation periods.
 - 4.6.4.3. Symptoms of influenza.
 - 4.6.4.4. Prevention & control measures in place at PHMG.
 - 4.6.4.5. Status of operations at the Site.
 - 4.6.4.6. Changes in work locations.
 - 4.6.4.7. Changes in operational procedures as the result of decreased work force.
 - 4.6.4.8. Criteria & procedure to return to work after having influenza or being in isolation.

5. Definitions

- 5.1. Exposure: Contact with infectious agent (bacteria/virus) in a manner that promotes transmission and increased the likelihood of disease onset.
- 5.2. Incubation Period: the time from contact with infectious agent to onset of disease.
- 5.3. Influenza: a highly contagious viral infection characterized by sudden onset of fever, severe aches and pains, and inflammation of mucous membrane.
- 5.4. Outbreak: a sudden appearance of a disease in a specific geographic area (i.e. specific neighbourhood/community) or population (i.e. young/work group).
- 5.5. Pandemic: an epidemic affecting a high proportion of the population at risk, occurring over a very large area.
- 5.6. Phases 1-6: referenced to the WHO Alert Phase system
- 5.7. Quarantine: the isolation of a person who has the disease (or is suspected of having disease) in order to prevent further spread of the disease

6. Version Record

Version #	Effective Date	Responsible Person	Description of Change	Approved By	Approval Signature <i>only shown on current version</i>
1.0	2009-10-30	J. Marks-Gibb	New Document	President/CEO	-----
2.0	2020-03-16	P. Kriz	Updated format, revised to align with WHO	B. MacIntyre	