

Luce Research LLC. Covid-19 Public Health Emergency Policy.

PURPOSE

Consistent with its duty to provide and maintain a workplace that is free of recognized hazards, Luce Research LLC. has adopted this policy to help safeguard the health and well-being of employees and their families; our customers and visitors; others who spend time in our facilities; and the community from infectious conditions that may be mitigated through our Covid-19 protocols. This policy is intended to comply with all state and local laws. It is based upon guidance provided by the Centers for Disease Control and Prevention (CDC) and public health authorities, as applicable.

SCOPE

This policy applies to all employees. It does not apply to customers and visitors. Although anyone who is not employed by Luce Research, who enters our facility is required to follow any masking or sick requirements we may have in place. Any such requirements will be clearly posted on the entry doors.

REPORTING POSITIVE COVID-19 TEST RESULTS, COVID-19 DIAGNOSIS, OR ANY FORM OF SICK SYMPTOM THAT COULD REASONABLY RELATE TO COVID-19

First of all, onsite employees must immediately report a positive COVID-19 test result or a Positive COVID-19 diagnosis, by contacting HR at 719-272-7200 xt:209 for Meheerah HR, or xt:205 for Samantha Boy Payroll Mon-Fri, or xt:200 Scheduling, on the weekends. In Lieu of being able to contact the HR Director or Payroll Coordinator, either of our Lead Schedulers will be able to assist employees in reporting their results at xt:200. Positive diagnosis or test results must be reported within 24 hours, if you cannot get in touch with someone leave a voice mail. Upon receiving a positive test result, or diagnosis. Employees must also immediately refrain from entering the building until they have been cleared to return through standard Return-To-Work protocols as set forth by the CDC, these protocols are designed to help protect you and the rest of our staff.

If an employee suspects that they have been exposed to someone who has Covid-19 or is suspected of having Covid-19 they must notify HR at the aforementioned extensions, and refrain from coming into the facility until cleared to return to the facility by the HR dept. Luce Research will advise you on return-to-work protocols set forth by the CDC and other governing bodies.

If an employee exhibits ANY sick symptoms, they must immediately notify HR by way of the aforementioned extensions, and refrain from coming into the facility until cleared to return to the facility by the HR Dept. Luce Research will advise the employee on return-to-work protocols set forth by the CDC and other governing bodies, to clear you and keep the staff safe.

Finally, In the event an employee is at work, and begins feeling ill. It is the responsibility of the employee to immediately notify their manager and leave the building. Then said employee needs to call the front desk at xt:200 to receive advisement on the next steps. This employee would also need to refrain from returning to the building until they have been advised on which return-to-work protocols would be applicable to them.

In any of the 4 scenarios above employees will be required to follow strict return-to-work protocols and receive clearance to return before stepping foot back on Luce Research premises.

All employees are held to a high level of responsibility in these various scenarios and failure to follow these basic instructions and protocols can lead to devastating consequences. Repercussions for failing protocol and putting the health and safety of employees at risk, include but are not limited to immediate termination.

RETURN-TO-WORK, TERMS AND DEFINITIONS

Isolation

- Isolation is separating individuals who are sick with COVID-19 from individuals who are not sick.
- A person should isolate if:
 1. They test positive for COVID-19 by PCR (nose swab). This is known as a confirmed case.
 2. They test positive with an antigen test or they are suspected of having COVID-19 based on symptoms alone. This is known as a probable case.
 3. Someone in isolation should stay home and away from others, including not going to work in an offsite location.

Quarantine

- Quarantine is for individuals who were in close contact with a confirmed COVID-19 case but are not showing symptoms (asymptomatic). Quarantine options are below.

Close contacts

- Close contacts of persons with confirmed or probable COVID-19 should self-quarantine from the time of their last contact with the person.
- Anyone who is a close contact should contact their primary care provider if they begin experiencing any symptoms (fever, cough, shortness of breath, sore throat, body aches, fatigue, loss of taste or smell, congestion, nausea, vomiting, or diarrhea, or any other sick symptom).

Who counts as a close contact?

- Anyone who was within six feet of someone who has COVID-19 for at least 15 minutes (total time over each 24 hour period) in the 48 hours prior to symptom onset thru the end of their isolation period.
- Anyone who provided care at home to someone who is sick with COVID-19.
- Anyone who had direct physical contact with the sick person (touched, hugged, or kissed them).
- Anyone who shared eating or drinking utensils with the sick person.
- Anyone whom the sick person sneezed on, coughed on, or otherwise got respiratory droplets on.

LUCE RESEARCH RETURN-TO-WORK REQUIREMENTS

Employee has sick symptoms but has NOT been exposed to Covid-19 to the best of their knowledge.

When an employee is sick and calls out of work or is sent home from work due to exhibiting any sick symptoms that can reasonably relate to Covid-19, and the employee has NOT, to the best of their knowledge, been exposed to anyone with Covid-19. The employee must refrain from entering the building again until one of the following requirements have been met. The employee also has an obligation to immediately contact Meheerah xt:209 or Samantha xt:205 leave a voice mail if we do not answer, this is to notify us of the illness so we can determine if it could relate to Covid-19 based on symptoms, these days pretty much any sick symptoms can reasonably relate to Covid-19. Then the employee may choose one of the following options:

1. Choose to Isolate for 14 days. You must speak with either Meheerah or Samantha at the end of the 14-day isolation period, prior to returning to work, to receive clearance to return to work.
 - During isolation, an individual should take their temperature once or twice a day to be sure they do not have a fever (greater than 100.4°F) and watch for symptoms of COVID-19, including fever, cough, shortness of breath, sore throat, body aches, fatigue, loss of taste or smell, congestion, nausea, vomiting, or diarrhea. It might take days for all symptoms to develop, and some infected individuals might only have mild symptoms. Call your primary care physician if your symptoms worsen or if you experience a high fever. This does not constitute as medical advice. You should contact your Dr. for any medically related advice or direction.

2. Submit a negative Covid-19 test. When submitting a test result please send it to meheerah@luceresearch.com & samantha@luceresearch.com by including both email addresses it ensures a prompt response. You will then be contacted and provided clearance to return to work as long as the result is negative. You may not return to work prior to receiving the clearance email or phone call.
3. When the test result is positive. Please submit the test result to meheerah@luceresearch.com & samantha@luceresearch.com by including both email addresses it ensures a prompt response. when the result is positive the employee will need to continue to isolate for the remainder of the 14 days. You must speak with either Meheerah or Samantha at the end of the 14-day isolation period, prior to returning to work, to receive clearance to return to work.

Employee is sick and HAS been exposed to someone who has been diagnosed by way of test or Dr. with Covid-19 or is suspected to have Covid-19 based on symptoms or exposure.

In cases where the employee is sick and calls out of work or is sent home from work due to exhibiting any sick symptoms that can reasonably relate to Covid-19, and the employee has been exposed to someone who has been diagnosed with Covid-19 or is suspected to have Covid-19 based on symptoms. The employee must refrain from entering the building again until one of the following requirements have been met. The employee also has an obligation to immediately contact Meheerah xt:209 or Samantha xt:205 leave a voice mail if we do not answer, this is to notify us of the illness so we can determine if it could relate to Covid-19 based on symptoms, these days pretty much any sick symptoms can reasonably relate to Covid-19. Then the employee may choose one of the following options:

1. Choose to Isolate for 14 days. The employee must speak with either Meheerah or Samantha at the end of the 14 day isolation period, prior to returning to work, to receive clearance to return to work.
 - During isolation, an individual should take their temperature once or twice a day to be sure they do not have a fever (greater than 100.4°F) and watch for symptoms of COVID-19, including fever, cough, shortness of breath, sore throat, body aches, fatigue, loss of taste or smell, congestion, nausea, vomiting, or diarrhea. It might take days for all symptoms to develop, and some infected individuals might only have mild symptoms. Call your primary care physician if your symptoms worsen or if you experience a high fever. This does not constitute as medical advice. You should contact your Dr. for any medically related advice or direction.
2. Take a Covid-19 test no sooner than 5-7 days after exposure and submit the negative test. When submitting a test result please send it to meheerah@luceresearch.com & samantha@luceresearch.com by including both email addresses it ensures a prompt response. You will then be contacted and provided clearance to return to work as long as the result is negative. You may not return to work prior to receiving the clearance email or phone call.

3. When the test result is positive. Please submit the test result to meheerah@luceresearch.com & samantha@luceresearch.com by including both email addresses it ensures a prompt response. when the result is positive the employee will need to continue to isolate for the remainder of the 14 days. You must speak with either Meheerah or Samantha at the end of the 14-day isolation period, prior to returning to work, to receive clearance to return to work.

Employee has no symptoms but has been exposed to someone who has been diagnosed by way of test or Dr. with Covid-19 or is suspected to have Covid-19 based on symptoms or exposure.

In scenarios where the employee is asymptomatic but has been exposed to someone with Covid-19 or who is suspected of having Covid-19 based on symptoms or exposure. The employee must refrain from entering the building again until one of the following requirements have been met. The employee also has an obligation to immediately contact Meheerah xt:209 or Samantha xt:205 leave a voice mail if we do not answer, this is to notify us of the illness so we can determine if it could relate to Covid-19 based on symptoms, these days pretty much any sick symptoms can reasonably relate to Covid-19. Then the employee may choose one of the following options:

1. Choose to quarantine for 14 days. The employee must speak with either Meheerah or Samantha at the end of the 14-day isolation period, prior to returning to work, to receive clearance to return to work.
 - During quarantine, an individual should take their temperature once or twice a day to be sure they do not have a fever (greater than 100.4°F) and watch for symptoms of COVID-19, including fever, cough, shortness of breath, sore throat, body aches, fatigue, loss of taste or smell, congestion, nausea, vomiting, or diarrhea. It might take days for all symptoms to develop, and some infected individuals might only have mild symptoms. Call your primary care physician if your symptoms worsen or if you experience a high fever. This does not constitute as medical advice. You should contact your Dr. for any medically related advice or direction.
2. Take a Covid-19 test no sooner than 5-7 days after exposure and submit the negative test. When submitting a test result please send it to meheerah@luceresearch.com & samantha@luceresearch.com by including both email addresses it ensures a prompt response. You will then be contacted and provided clearance to return to work as long as the result is negative. You may not return to work prior to receiving the clearance email or phone call.
3. When the test result is positive. Please submit the test result to meheerah@luceresearch.com & samantha@luceresearch.com by including both email addresses it ensures a prompt response. when the result is positive the employee will need to continue to isolate for the remainder of the 14 days. You must speak with either Meheerah or Samantha at the end of the 14-day isolation period, prior to returning to work, to receive clearance to return to work.

Employee is either sick or asymptomatic, but a member of their household has tested positive for Covid-19

In the event a member of an employee's household tests positive for Covid-19. The employee must refrain from entering the building again until receiving clearance to return. The employee also has an obligation to immediately contact Meheerah xt:209 or Samantha xt:205 to notify us, leave a voice mail if we do not answer. Do NOT share information about who tested negative, whether it is a friend or family member etc. that is irrelevant information. What matters is that the employee is exposed to this individual daily and cannot reasonably avoid all contact due to living in the same household. In this specific scenario the employee will need to quarantine/Isolate for a 14-day period. The obligations under this scenario are:

- quarantine/Isolate for 14 days. You must speak with either Meheerah or Samantha at the end of the 14-day isolation period, prior to returning to work, to receive clearance to return to work.
- During quarantine/isolation, an individual should take their temperature once or twice a day to be sure they do not have a fever (greater than 100.4°F) and watch for symptoms of COVID-19, including fever, cough, shortness of breath, sore throat, body aches, fatigue, loss of taste or smell, congestion, nausea, vomiting, or diarrhea. It might take days for all symptoms to develop, and some infected individuals might only have mild symptoms. Call your primary care physician if your symptoms worsen or if you experience a high fever. This does not constitute as medical advice. You should contact your Dr. for any medically related advice or direction.

Employee tests positive for, or is diagnosed with Covid-19

When an employee tests positive for Covid-19 or is otherwise diagnosed with Covid-19 the employee must immediately refrain from entering the building. The employee also has an obligation to immediately contact Meheerah xt:209 or Samantha xt:205 to notify us, leave a voice mail if we do not answer, notification needs to be made as soon as possible but no later than 24 hours from receiving the result or diagnosis. The employee must then follow the isolation process.

- Isolate for 14 days. You must speak with either Meheerah or Samantha at the end of the 14-day isolation period, prior to returning to work, to receive clearance to return to work.
- Individuals who have been diagnosed with Covid-19 should closely monitor their health status and keep in touch with their health care provider regarding any worsening symptoms. This does not constitute as medical advice. You should contact your Dr. for any medically related advice or direction.

Employees who are asymptomatic but had to take a Covid-19 test for a reason not related to being sick or being subject to exposure

An asymptomatic employee, who is subject to having to take a Covid test for travel or some other reason that is unrelated to being sick, or experiencing exposure. Could receive a notification of test results while at work, and have the results be positive. Regardless of vaccination status the employee must:

- Ensure they maintain 6 feet of social distancing as they exit the building. Let their Coach/Point or Manager know that they aren't feeling well and let them know they have to

leave, and then leave the building immediately. Passing this information along is critical, the employee isn't divulging their test results unnecessarily, but they are prompting the Coach to sanitize the employees work area immediately by stating they aren't feeling well. The employee must then contact Meheerah xt:209 or Samantha xt:205 to notify us of the test result, leave a voice mail if we do not answer.

- Isolate for 14 days. The employee must speak with either Meheerah or Samantha at the end of the 14-day isolation period, prior to returning to work, to receive clearance to return to work.
- Individuals who have been diagnosed with Covid-19 should closely monitor their health status and keep in touch with their health care provider regarding any worsening symptoms. This does not constitute as medical advice. You should contact your Dr. for any medically related advice or direction.

How does an employee obtain Return-To-Work Clearance?

For those employees who fall under the category of being able to provide a negative test result. These employees will be contacted once the negative test result is received and reviewed. Contact will come by way of email or phone call. Employees may not return to the facility before receiving this clearance.

For employees who are required to quarantine or isolate or have chosen to quarantine or isolate, in lieu of taking a Covid-19 test. Can be cleared to return to work as long as they have met the 14-day requirements and given that they follow through with the clearance process. As previously stated, employees will need to obtain clearance to return to work. Employees must speak with Meheerah or Samantha prior to returning so the following questions can be asked and verified:

Symptom-based return

For persons with COVID-19 who had symptoms and tested positive OR only had COVID-19 symptoms and did not test, isolation may end when all three of these criteria have been met:

- At least 14 days have passed since their symptoms first appeared, AND
- **(Employee should be asked this question to obtain clearance)** At least 24 hours since fever resolved without using fever-reducing medication, AND
- **(Employee should be asked this question to obtain clearance)** At least 24 hours of symptom improvement (any COVID-19 symptoms)

Time-based return

For persons who tested positive for COVID-19 but never had symptoms OR was exposed to someone with Covid-19 OR was exposed to someone who was suspected of having Covid-19 based on symptoms or exposure. Quarantine/isolation may end when:

- 14 days have passed since the testing date, provided no symptoms developed since their positive test. If they developed symptoms, then the symptom-based strategy should be used. **(Employee should be asked if they developed symptoms over this period, to obtain clearance)**

How does this policy effect fully vaccinated employees?

If you are fully vaccinated, you are not required to quarantine after possible or confirmed exposure to the virus if you meet the three criteria below:

1. You must be 2 weeks from your final vaccine dose
2. You are currently within 90 days since your final dose and,
3. You are showing no symptoms

Fully vaccinated individuals who have been exposed, will still need to take a covid test 5-7 days after exposure, in the meantime they may continue working as long as they remain symptom free and continue to practice social distancing, and wear face masks at all times when at work for the duration of 14 days or until providing a negative Covid-19 test.

MASK POLICY FOR UNVACCINATED EMPLOYEES

Unvaccinated employees must wear a mask at all times while entering the building and while walking throughout the building. Employees are not required to wear a mask while sitting at their workstations, however if the employee is sitting at their workstation within 6 feet of anyone, they must put their mask on. You should be able to maintain 6 feet of social distancing the vast majority of the time.

MASK ACCOMMODATIONS

These resources were pulled directly from the FMLA and the ADA on this particular subject.

“Family and Medical Leave Act:

If an employee says her medical condition makes it difficult to wear a face covering, the first issue to address is whether her inability to work with a mask constitutes a qualifying condition under the Family and Medical Leave Act (FMLA).

The FMLA permits eligible employees to take up to 12 weeks of job-protected leave in a 12-month period if they are incapacitated by a serious health condition. It seems likely the typical respiratory or cardiac ailments that interfere with mask-wearing would meet this standard.

Therefore, if the employee is otherwise eligible for FMLA (being employed for at least 1 year and working at least 1,250 hours in the last year), you should first require her to get FMLA certification from her healthcare provider. If the certification indicates the existence of a serious health condition, then you should provide her with FMLA leave for up to 12 weeks (less any FMLA time previously taken in the year).

Americans with Disabilities Act:

If the employee claiming inability to work with a mask isn't eligible for FMLA leave or has used up her eligibility, she may still be entitled to reasonable accommodation under the Americans with Disabilities Act (ADA) and its state law counterpart, the Minnesota Human Rights Act (MHRA), for example. You should therefore initiate an interactive process designed to determine whether she actually needs an accommodation, and if so, whether any such accommodation is both possible and reasonable.

The first step is to request documentation from the employee's healthcare provider to verify the medical condition (1) exists and (2) impairs her ability to wear a face covering in accordance with the law. While awaiting this documentation, don't allow her to continue coming to the work site. Instead, consider placing her on a leave, allowing telework if possible, or providing some other temporary accommodation until the matter is resolved.

Naturally, if no such documentation is provided, no accommodation is needed, and the employee should be directed to return to her regular assignment. If proper documentation is submitted, you should consider the range of possible accommodations, such as providing a different sort of face covering (e.g., face shield), temporarily reassigning her to a vacant position that doesn't require wearing a face covering (e.g., one that works outside), allowing her to telework, isolating her, or providing other responsive job modifications.

If no accommodation is possible, or if the possible accommodations just aren't reasonable under the particular circumstances, you should place the employee on leave until the face mask order is rescinded or her medical condition improves to permit a mask to be worn. Employees who have been on FMLA leave for the same issue will simply remain on leave but will no longer be subject to the Act's protections."

If for a medically related issue you are not able to wear a mask at work under the current Luce Research Mask Policy. Luce Research will be following the above protocols set forth by the Americans with Disabilities Act. If you have read this and would like to request an accommodation, we ask that you call Meheerah at 719-272-7200 xt:209 to discuss reasonable accommodations. If you are set up to be able to work remotely for the company, or have the necessary tools needed to work remotely, Internet, Computer with Windows 7 or later, cell phone with headset, that would certainly be the most readily available accommodation and would conform to a reasonable accommodation per the ADA. If you are not able to work remotely then please give Meheerah a call.

Resources noted here: first we would determine if this would qualify for FMLA leave, then we would follow the guidelines set forth above by the ADA.

TESTING PROCESS

Employee's who choose to take a Covid-19 test to obtain clearance to return to work will be required to follow specific Return-To-Work protocols. These measures are in place to help ensure the health and safety of all our employees.

1. We will not require employees to go and test at a required time or place. This choice will be at the employee's discretion. It is expected that the Covid-19 test employees choose will come at no cost to them. There are many locations here in Colorado Springs where employees can obtain a free test with or without insurance. If employees choose to pay out of pocket for a test, it is the company's stance that this choice is one of convenience and not necessity. There are numerous free testing options available that you can take advantage of. Luce research will not be held responsible for the cost of testing, nor the personal financial hardship or burden it may impose on the employee.
2. When the employee has obtained their test results, they will need to send a copy of the test result as soon as it is received, to Meheerah at meheerah@luceresearch.com or in his absence Samantha at samantha@luceresearch.com The test must identify the result, it must contain, at least, the employee's first name and it must show the date of the test. Results lacking this information will not be accepted. Employees must submit results in digital format. They are NOT permitted to hand deliver a paper copy, the employee could misread their results, and this would put our other employees at risk of exposure.
3. Once the result is reviewed the employee will receive a confirmation email which clears them to return to work. The employee is NOT cleared to re-enter the facility until after they have received this clearance email.

VACCINATION PROCESS

To establish proof of vaccination status, employees will need to present written evidence of immunization. If you have already done this, you are not required to wear a mask in the facility, unless you have been exposed to someone with Covid-19 or someone who is suspected of having Covid-19.

You may submit your proof of vaccination status by emailing a copy of your vaccination card or vaccination record to meheerah@luceresearch.com. Or by presenting a copy to the staff at the front desk, who will then scan a copy to the HR Director for record keeping and proof of vaccination status.

Full vaccination is not reached until 2 full weeks after an employee's final vaccination dose. In the meantime, and up until the point of full vaccination, employees need to wear masks per the mask policy.

COSTS

- Vaccination will be at the expense of the employee. Although many locations offer free Vaccinations.
- Costs associated with Covid-19 testing will be at the expense of the employee. Although many locations offer free testing.
- Employers are also not obliged to reimburse employees for transportation costs (e.g., gas money, train/bus fare etc.) incurred to receive the vaccination or Covid-19 test. This could include costs of travel to an off-site vaccination location etc.
- Testing time is compensable, excluding time spent waiting on results
- Some missed work may be compensable based on available sick leave and covid pay relating to the Colorado sick leave act

DISCIPLINARY ACTIONS FOR EMPLOYEES WHO DO NOT COMPLY WITH POLICY

Employees who are unvaccinated and are caught without their mask on while in the building, except when seated at their station and practicing proper social distancing. Will face disciplinary actions up to and including termination, if the employee is unable to present a vaccination card or record proving full vaccination.

Employees who otherwise put the companies' employees at risk of contracting Covid-19 or causing the risk of Covid-19 spread within the company by coming into the building while sick or after known exposure, including while waiting on a Covid-19 test result that was taken because of concerns related to sickness or exposure. Will face disciplinary actions up to and including termination.

Falsely stating you have Covid-19 while in the building and causing panic and fear amongst the staff. Will result in disciplinary actions including but not limited to termination.

Disciplinary actions, which include termination are not limited to those items listed here. Anything that reasonably puts the employee who committed the act or fellow employees at risk, will result in disciplinary actions including but not limited to termination of employment.

These Disciplinary actions are set in place to help protect the health and safety of our wonderful employees. Failure to adhere to policy can have devastating consequences, including loss of life. Due to the seriousness of this matter, we will take all violations of policy seriously. All employees must remain diligent and conscious of their responsibilities when it comes to keeping Luce Research as safe a working environment as possible.

RISK AND POSSIBLE EXPOSURE NOTIFICATIONS

Any risk of exposure notifications will be sent companywide via the newsfeed in the Sling application.

During this critical time. Employees need to keep a close eye on the Critical information Newsfeed within the Sling application.

In the event it is believed there could be a risk of exposure as defined by Colorado Public Health. “Who Counts as close contact” section of this policy. We will personally contact anyone we believe may have been subject to exposure via the phone number we have on file.