

Tri-Star Trust Bank COVID-19 Preparedness and Response Plan

In accordance with Michigan Executive Order 2020-97 and OSHA 3990-03 2020, Tri-Star Trust Bank (“Tri-Star”) institutes this COVID-19 Preparedness and Response Plan (“Plan”).

Tri-Star aims to protect its employees by enacting all appropriate prevention efforts. Tri-Star is continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate.

Employees with questions are encouraged to contact the President/CEO, a member of the Strategic Group, or Director of Human Resources.

Tri-Star designates location supervisors to implement, monitor, and report on this Plan.

1. Prevention Efforts and Workplace Controls

a. Cleanliness and Social Distancing

Employees who are able to perform their essential duties remotely have the option to work from home in accordance with approved policies until further notice.

For those employees who chose to report to work on-site, Tri-Star abides by the recommended social distancing and other safety measures and establishes the following:

- Indoor social gatherings of more than 10 people are prohibited.
- Staff meetings are held remotely or postponed;
- Employees are required to maintain physical distance when reporting to work;
- Employees’ interactions with the general public are modified to allow for additional physical space between parties;
- Non-essential travel is postponed or cancelled; and
- Employees are required to follow daily screening requirements as detailed below in section 2a and 2b.

Tri-Star provides employees with, at a minimum, non-medical grade face coverings. Face coverings are required to be worn by employees in shared spaces, including hallways, breakrooms, and during in-person meetings; and anytime they cannot maintain six feet of separation.

In addition, Tri-Star is instituting the following cleanliness measures:

- Increasing facility cleaning and disinfection, especially of common areas and frequently touched surfaces; and
- Where available, providing hand sanitizer in high-traffic areas to enable easy access.

Employees are expected to minimize COVID-19 exposure by:

- Cleaning work stations at the beginning and end of each day;
- Avoiding the use of other employees’ computers, phones, offices, or other equipment;
- Frequently cleaning and disinfecting shared tools and equipment;
- 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 Tri-Star premises to designated Plan supervisors and/or Human Resources;
- Complying with Tri-Star’s daily screening requirements;
- Seeking medical attention if experiencing COVID-19 symptoms; and
- Complying with self-isolation or quarantine orders.

As it relates to non-staff visitors to our offices, the following applies:

- If at all possible, meetings with clients, prospects, or stakeholders should be encouraged to occur remotely via video conference technology. If a client / prospect prefers to meet at our offices, or it is necessary for a critical vendor to enter one of our facilities, then the following rules apply.
- Pre-scheduled appointments will be strongly encouraged.
- Prior to entry, all visitors will be required to answer the Daily Screening questions as stated below under section 2b, and only those visitors who answer “No” to those questions will be allowed to enter.
- All visitors will be required to provide their name, phone number, and which employee they will be meeting with.
- Face coverings are required to be worn following the same rules as stated above for employees. Clients / prospects will be offered a non-medical face covering by Tri-Star for them to keep if they do not have one of their own.
- Handshakes, hugs, or other forms of physical contact will be prohibited.
- Access areas will be defined for each of our physical offices, and will generally be limited to lobbies, conference rooms, and hallways between these spaces.
- Thorough cleaning and sanitization will be required immediately after meetings with outside visitors, and to the extent possible should be done in a way that is visible to the visitor.

Employees are trained on the information contained within this Plan, as well as the CDC’s “How to Protect Yourself and Others” and “How to Safely Wear and Take Off a Cloth Face Covering” posters, attached here. Employees return a signed acknowledgement to Human Resources, confirming their receipt and review of the information.

b. Worker Exposure Classification

Employees’ “worker exposure” is classified as lower risk by the OSHA’s guidance if they do not have frequent or close interaction with the general public, and social distancing can be maintained between coworkers. The majority of Tri-Star employees would be considered lower risk.

Given this classification, no additional controls are recommended or required by OSHA at this time.

Employees’ “worker exposure” is classified as medium risk by the OSHA’s guidance if they have frequent or close interaction with the general public. Several categories of Tri-Star employees

would be considered medium risk: client facing employees and employees greeting clients, visitors, and vendors at the reception desk.

Given this classification, Tri-Star considers the following controls in addition to the above-summarized prevention efforts: limiting exposure to the general public and minimizing face-to-face contact.

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.

a. Employees' Self-Monitoring

The following employees should not report to work and should timely notify their supervisor and Human Resources:

- Employees who display COVID-19 symptoms, such as fever of 100.4 degrees or higher, cough, chills, shortness of breath or difficulty breathing, 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 employees may only resume in-person work upon meeting all return-to-work requirements, defined below.

b. Daily Screenings

To prevent the spread of COVID-19 and reduce the potential risk of exposure, Tri-Star employees will self-screen on a daily basis.

Employees are asked to answer the following questions every day before reporting to work on-site:

1. Do you currently have symptoms of fever of 100.4 F or higher, chills, cough (without known/chronic cause), shortness of breath, difficulty breathing, sore throat, new loss of smell or taste, and/or gastrointestinal problems including nausea, diarrhea, and vomiting?
2. Have you had close contact in the last 14 days with an individual diagnosed or displaying the symptoms of COVID-19?

If an employee answered yes to any of these questions, the employee is required to self-isolate/self-quarantine at home and timely notify their supervisor and Human Resources. The

employee is permitted to return to work on-site upon meeting all return-to-work requirements, defined below.

Employees who develop symptoms during their shift must immediately report to their supervisor and/or Human Resources.

c. Return-to-Work Requirements

Employees who were themselves diagnosed with COVID-19, or experienced symptoms as defined by the Daily Screening process, may only return to work upon confirmation of the cessation of symptoms and contagiousness according to the latest guidelines from the Centers for Disease Control and Prevention (“CDC”), proof of which may be acquired by either the symptoms-based strategy or the test-based strategy.

Under the symptom-based strategy, employees may discontinue isolation and return to work under 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 10 days have passed since symptoms first appeared.

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

- Resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- Two consecutive negative results from COVID-19 tests conducted at least 24 hours apart and in accordance with the current FDA/CDC-recommended procedure.

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.

d. Tri-Star’s Response 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 must be immediately removed from the workplace.

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

- Informs all employees, visitors, and/or vendors who may have come in contact with the diagnosed/symptomatic employee of a potential exposure;
- Keeps confidential the identity of the diagnosed/symptomatic employee; and
- Conducts deep cleaning of the diagnosed/symptomatic employee’s workstation, as well as those common areas potentially infected by the employee.

All employees who worked in sustained, close proximity to the diagnosed/symptomatic employee are also removed from the workplace for at least 14 days.

Tri-Star's Human Resources confidentially maintains documentation on diagnosed/symptomatic employees and all exposure notifications. Within 24 hours of a confirmed COVID-19 diagnosis, Tri-Star must notify the local public health department.

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

Employees may be eligible for paid and unpaid leaves. Employees may be permitted to utilize available paid-time off provided under Tri-Star policy to supplement any approved leave.

a. FFCRA

Employees may qualify for two different types of paid leave under the Families First Coronavirus Response Act ("FFCRA") – Emergency Paid Sick Leave and Emergency FMLA Expansion Leave.

b. Executive Order 2020-36

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

c. ADA

Tri-Star 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, then Tri-Star engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable).

4. Plan Updates and Expiration

This Plan responds to the COVID-19 outbreak and will be an evolving document. As the pandemic progresses and additional data becomes available, Tri-Star will update this Plan and its corresponding processes.

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

ACKNOWLEDGMENT

By signing below, Employee acknowledges receipt of and training on the following:

- Company's COVID-19 Preparedness and Response Plan;
- CDC's "How to Protect Yourself and Others" poster; and
- CDC's "How to Safely Wear and Take Off a Cloth Face Covering" poster.

Employee understands it is his/her responsibility to review and understand the above. Employee acknowledges and agrees that he/she will comply with all safety and COVID-19 procedures implemented by Tri-Star Trust Bank.

Employee

Date