

COVID-19 Preparedness Plan template and instructions

Under Governor Tim Walz's Executive Orders, identified businesses that are in operation during the peacetime emergency are required to establish a COVID-19 Preparedness Plan.

A business's COVID-19 Preparedness Plan shall establish and explain the policies, practices and conditions necessary to meet the Centers for Disease Control and Prevention (CDC) and Minnesota Department of Health (MDH) guidelines for COVID-19, federal Occupational Safety and Health Administration (OSHA) standards and Executive Order 20-48 related to worker and customer – if the business has customer-facing operations – exposure to COVID-19. The plan should have the strong commitment of management and be developed and implemented with the participation of workers. The Minnesota Department of Labor and Industry (DLI), in consultation with MDH, has the authority to determine whether a plan is adequate.

Your COVID-19 Preparedness Plan must include and describe how your business will implement, at a minimum, the following, in compliance with the guidelines and standards above:

1. infection prevention measures;
2. prompt identification and isolation of sick persons;
3. engineering and administrative controls for social distancing;
4. cleaning, disinfecting, decontamination and ventilation;
5. communications and training for managers and workers necessary to implement the plan; and
6. provision of management and supervision necessary to ensure effective ongoing implementation of the plan.

If you are a retail business providing for pick-up, drop-off, delivery and/or in-store shopping or are a retail mall your plan must also include and describe how your business will implement, at a minimum, the following, in compliance with the above guidance and standards:

7. protection and controls for pick-up, drop-off and delivery;
8. protections and controls for in-store shopping;
9. protections and controls for shopping malls; and
10. communications and instructions for customers.

This document includes a template for a COVID-19 Preparedness Plan that includes the criteria listed above **and is developed to fit the potential needs of different types of businesses. This template should be used with the checklist guidelines for creating a COVID-19 Preparedness Plan available at www.dli.mn.gov/updates**. No business is required to use this template. If you choose to use this template, you must adapt it to fit the specific needs of your business while ensuring it meets the minimum requirements set out above.

COVID-19 Preparedness Plan for Crossroads Center

Crossroads Center is committed to providing a safe and healthy workplace for all our workers and customers. To ensure we have a safe and healthy workplace, we have developed the following COVID-19 Preparedness Plan in response to the COVID-19 pandemic. Managers and workers are all responsible for implementing this plan. Our goal is to mitigate the potential for transmission of COVID-19 in our workplaces and communities, and that requires full cooperation among our workers, management, and customers. Only through this cooperative effort can we establish and maintain the safety and health of our workers and workplaces.

Management and workers are responsible for implementing and complying with all aspects of this COVID-19 Preparedness Plan. Crossroads Center managers and supervisors have our full support in enforcing the provisions of this policy.

Our workers are our most important assets. We are serious about safety and health and keeping our workers working at Crossroads Center. Worker involvement is essential in developing and implementing a successful COVID-19 Preparedness Plan. We have involved our workers in this process through in-depth consultation, incorporation of written and verbal feedback, and the sharing of company guidelines reflecting the concerns of our employees. Our COVID-19 Preparedness Plan follows Centers for Disease Control and Prevention (CDC) and Minnesota Department of Health (MDH) guidelines, federal OSHA standards related to COVID-19 and Executive Order 20-48, and addresses:

- hygiene and respiratory etiquette;
- engineering and administrative controls for social distancing;
- cleaning, disinfecting, decontamination and ventilation;
- prompt identification and isolation of sick persons;
- communications and training that will be provided to managers and workers; and
- management and supervision necessary to ensure effective implementation of the plan.
- protection and controls for pick-up, drop-off and delivery;
- protections and controls for in-store shopping;
- protections and controls for shopping malls; and
- communications and instructions for customers.

Screening and policies for employees exhibiting signs and symptoms of COVID-19

Crossroads Center and Brookfield Properties, Crossroads Center's manager and operator, have adopted a detailed Health and Sanitation Plan that is available at the following link and is incorporated into this preparedness plan by reference:

https://assets.digitalservices.ggp.com/content/dam/rw-2/documents/b2b/covid-19/BP-RetailPropertyHealthandSanitation_072120_Final.pdf

Among other items, the Health and Sanitation Plan provides the following:

- (i) protocols for employee, vendor, tenant, and guest health screening and monitoring (including self-monitoring and reporting requirements for employees);
- (ii) management of office practices designed for employee protection;
- (iii) employee hygiene, social distancing, office cleaning, and personal health protocols;
- (iv) guest protocols;
- (v) property cleaning protocols;
- (vi) social distancing protocols;
- (vii) vendor-specific guidance and best practices; and
- (viii) management of HVAC equipment.

Crossroads Center employees have all been provided with the Health and Sanitation Plan, and it is available publicly at the link posted above as well as the mall office.

Brookfield Properties and Crossroads Center have implemented leave policies that promote workers staying at home when they are sick, when household members are sick, or when required by a health care provider to isolate or quarantine themselves or a member of their household. Accommodations for workers with underlying medical conditions or who have household members with underlying health conditions have also been implemented. Under Brookfield Properties' Paid Sick Time policy, updated in March 2020, full-time employees are provided with a bank of paid sick time per year that can be used for all situations described above. Brookfield also offers FMLA, Short Term Disability, and Worker's Compensation benefits when employees are eligible under federal, state and/or company requirements.

Crossroads Center has also implemented procedures for informing workers if they have been exposed to a person with COVID-19 at their workplace and follows CDC recommendations for requiring quarantine for exposed employees. Brookfield Properties has also provided Crossroads Center employees with the required OSHA training, including a Certified Hazard Assessment and Job Safety Analysis.

In addition, Brookfield Properties endeavors to protect the privacy of workers' health status and health information consistent with relevant privacy laws.

Handwashing, respiratory etiquette, social distancing, and housekeeping protocols.

Basic infection prevention, social distancing, and housekeeping protocols at all times have been implemented at Crossroads Center. These detailed guidelines are set out in the Health and Sanitation Policy referenced above.

Protections and protocols specific to indoor shopping centers.

Consistent with the employer preparedness checklist provided by the Minnesota Department of Labor and Industry, Crossroads Center will be implementing the following protocols. These guidelines are subject to further revision and supplementation where appropriate and consistent with further instructions from the State of Minnesota:

1. Mall capacity will be limited to 50% or less of mall occupancy requirements.
2. Occupancy will be controlled based on vehicle counts, digital tracking and/or monitoring entrances and exits.
3. Traffic flow will be monitored and managed by security and mall staff inside and outside of the facility.
4. All communal seating, eating areas, play areas, stroller rentals and other areas where people may gather will be closed off.
5. Where technically feasible, regular announcements will be made over the property's audio system reminding customers of the importance of the Centers for Disease Control and Prevention's (CDC's) stated best practices for hygiene and physical distancing.
6. Assistance may be provided to mall tenants in establishing physical distancing for any customer lines that may be needed outside of tenant store entrances.
7. No large events and activities that result in people congregating will be held.
8. Pursuant to the Health and Sanitation Policy, the mall team and its vendors will frequently clean and disinfect common areas and particularly busy locations, such as restrooms.
9. Crossroads Center will have hand hygiene products at a minimum at entrances and available next to water stations with instructions for users to perform hand hygiene upon entry and before and after using the station.
10. Crossroads Center will provide for physical distancing in restrooms or limit restroom capacity, closing stalls where appropriate and including marking areas outside of bathrooms for customer waiting.
11. In elevators, Crossroads Center will post instruction that limit occupancy to one occupant or one family group.
12. Pursuant to applicable government orders, Crossroads Center recognizes that all individuals must wear a face covering in indoor areas accessible to the public. Crossroads Center will require that its employees wear a face covering when the individual is within any area open to the public or within six feet of another person. Customers are also required to wear a face covering before entering and until exiting the shopping center, unless an exemption under the applicable order applies.
13. Crossroads Center will conform with the "Workplace Building and Ventilation Protocols" required in the State's general industry guidance applicable to all businesses.

Communications and training

This COVID-19 Preparedness Plan was communicated to all Crossroads Center workers verbally and by e-mail and all necessary training was provided. Additional communication and training will be ongoing in future team meetings and provided to all workers who did not receive the initial training. Instructions will be communicated to customers and visitors about: how drop-off, pick-up, delivery and in-store shopping will be conducted to ensure social distancing between the customers and workers; required hygiene practices; and complying with the requirements regarding face coverings. Customers and visitors will also be advised not to enter the workplace if they are experiencing symptoms or have contracted COVID-19. Crossroads Center has communicated these protocols to the public on its website, through its Health and Sanitation Policy, and by its posting of detailed

signage on the shopping center property. Crossroads Center also regularly communicates with its tenants using its "One Call Now" communications tool, in addition to hosting conference calls to discuss ongoing developments at the property. Managers and supervisors are to monitor how effective the program has been implemented by regular updates with the property team and through communications with tenants and customers when relevant. Management and workers are to work through this new program together and update the training as necessary. This COVID-19 Preparedness Plan has been certified by Brookfield Properties and Crossroads Center management and was posted at the workplace on August 12, 2020. It is also available at the Crossroads Center website at <https://www.crossroadscenter.com/>. They will be updated as necessary.

Certified by:

A handwritten signature in black ink, appearing to be 'Caryn Torres', with a long horizontal stroke extending to the right.

Caryn Torres

Vice President Asset Management

Appendix A – Guidance for developing a COVID-19 Preparedness Plan

General

Centers for Disease Control and Prevention (CDC): Coronavirus (COVID-19) – www.cdc.gov/coronavirus/2019-nCoV

Minnesota Department of Health (MDH): Coronavirus – www.health.state.mn.us/diseases/coronavirus

State of Minnesota: COVID-19 response – <https://mn.gov/covid19>

Businesses

CDC: Resources for businesses and employers – www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html

CDC: General business frequently asked questions – www.cdc.gov/coronavirus/2019-ncov/community/general-business-faq.html

CDC: Building/business ventilation – www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html

MDH: Businesses and employers: COVID-19 – www.health.state.mn.us/diseases/coronavirus/businesses.html

MDH: Health screening checklist – www.health.state.mn.us/diseases/coronavirus/facilityhlthscreen.pdf

MDH: Materials for businesses and employers – www.health.state.mn.us/diseases/coronavirus/materials

Minnesota Department of Employment and Economic Development (DEED): COVID-19 information and resources – <https://mn.gov/deed/newscenter/covid/>

Minnesota Department of Labor and Industry (DLI): Updates related to COVID-19 – www.dli.mn.gov/updates

Federal OSHA – www.osha.gov

Handwashing

MDH: Handwashing video translated into multiple languages – www.youtube.com/watch?v=LdQuPGVcceg

Respiratory etiquette: Cover your cough or sneeze

CDC: www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html

CDC: www.cdc.gov/healthywater/hygiene/etiquette/coughing_sneezing.html

MDH: www.health.state.mn.us/diseases/coronavirus/prevention.html

Social distancing

CDC: www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html

MDH: www.health.state.mn.us/diseases/coronavirus/businesses.html

Housekeeping

CDC: www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html

CDC: www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html

CDC: www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html

Environmental Protection Agency (EPA): www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2

Employees exhibiting signs and symptoms of COVID-19

CDC: www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html

MDH: www.health.state.mn.us/diseases/coronavirus/basics.html

MDH: www.health.state.mn.us/diseases/coronavirus/facilityhlthscreen.pdf

MDH: www.health.state.mn.us/diseases/coronavirus/returntowork.pdf

State of Minnesota – <https://mn.gov/covid19/for-minnesotans/if-sick/get-tested/index.jsp>

Training

CDC: www.cdc.gov/coronavirus/2019-ncov/community/guidance-small-business.html

Federal OSHA: www.osha.gov/Publications/OSHA3990.pdf

MDH: www.health.state.mn.us/diseases/coronavirus/about.pdf