

COVID-19 PHASE 5 POLICIES

Purpose. To establish temporary policies and procedures during Hessel Fetterman LLP's Phase 5 response to COVID-19, and to clarify essential performance expectations for all of us at the Firm, whatever our roles. This policy will be in effect beginning June [●], 2020¹ through the end of the Firm's Phase 5 response.

Introductory Statement

Phase 5 is the next phase in the Firm's response to COVID-19. Following on Phase 4's full work-from-home mode, Phase 5 is intended to be a transitional phase that begins the return of the Firm's workforce to the office, with the plan that eventually a future phase will fully resume "normal" office operations at an undetermined date.

Phase 5 will be far from "normal" and everyone who enters and remains in our office will be asked to take precautions that to some may seem onerous and unnecessary. The Firm has determined that each of the precautions set forth in this policy is required by law or otherwise necessary and/or appropriate for the best interests of the Firm, its workforce, and all who enter our office, and each worker is expected to comply with this policy.

While this policy goes to lengths to minimize the risk of harm to the Firm's workforce and guests, this policy does not, and cannot, address every condition and situation that may be encountered. Every worker plays an important role under this policy in protecting their own health and the health and safety of co-workers and visitors. Workers are expected to apply common sense consistent with the intent of this policy when encountering conditions or situations not expressly addressed in this policy.

This policy supersedes the Firm's prior policies specifically addressing COVID-19 and the Firm's response to the disease.

Office Infection Control Measures

All workers must take personal precautions to stay healthy and to control the spread of infection in the Firm's office. Such precautions include:

SCREENING. Prior to arriving at the office, any worker who is working in the office must take their temperature and personally assess whether they have a fever, cough, shortness of breath, fatigue, muscle ache or new loss of taste or smell. Upon arrival in the Firm's office, each worker will be asked if they have a fever, cough, shortness of breath, fatigue, muscle aches, or new loss of taste or smell. If a worker has a temperature of 100.4°F or higher, a cough, shortness of breath,

¹ The effective date of these COVID-19 Phase 5 Policies will be the day Governor Jay Inslee moves King County to "Phase 2" of his *Safe Start Washington* plan, issued May 4, 2020.

fatigue, muscle ache or new loss of taste or smell, the worker should stay home (or will be sent home immediately) and follow the instructions set forth in the Ill and Exposed Worker Policy below.

In addition to, or in lieu of, the foregoing screening, the Firm may require each worker (and visitor), before entering the Firm's office, to submit to a screening kiosk, which may include facial recognition and temperature scanning. Workers may be registered into the screening kiosk system for purposes of the firm's logging those who arrive at and/or remain in the office each day.

PERSONAL PRECAUTIONS. Workers are expected to do the following:

- Frequently wash hands with soap and water for 20 seconds, or use hand sanitizer with at least 60% alcohol if no water is available.
- Avoid touching eyes, nose, and mouth with unwashed hands.
- Avoid close contact (within 6 feet) with others.
- Stay home if you are sick – that means: if you are coughing, sneezing, sniffing, having difficulty breathing, have a fever, or have any other identified symptoms of COVID-19, stay home and call in sick. If you begin to experience any of the foregoing symptoms while working in the office, then immediately notify the Human Resources Manager Ann Callahan or your immediate supervisor, leave the office and go home (if you are physically able to).
- Cover cough or sneeze with tissue, throw tissue in trash, wash hands. If a tissue is unavailable, cover your cough or sneeze with your elbow and wash hands; do not thereafter use that elbow to open doors or touch other surfaces. If you inadvertently use your hand(s) to contain a cough or sneeze, wash your hands right away without touching anything in the meantime.
- Clean and disinfect frequently touched objects and surfaces.
- Use only your own equipment (keyboard, telephone, etc.) and clean your equipment immediately if another uses it.
- Keep work surfaces clear of all papers and other items not in use.

MASK YOUR FACE. The Firm will provide five cloth masks to every worker to keep for their personal use. (Under the Visitor Policy below, the firm will also provide a disposable mask to each visitor upon entry to our office.) Everyone is expected to wear the mask in all locations of the

office. Mask use supplements, and does not replace, other requirements in this Policy and the need to practice physical distancing, frequent handwashing, and avoiding touching of the face.

USE YOUR ELBOW. While wearing masks will reduce the spread of airborne germs, they are not perfect. Please² still use tissue or an elbow to contain coughs or sneezes and limit the spread of airborne germs, even when you are wearing a mask. If you inadvertently use your hand(s) to contain a cough or sneeze, wash your hands right away without touching anything in the meantime.

SANITIZE YOUR HANDS. You will find hand sanitizer in multiple places around the Firm. Sanitize your hands with frequency.

WORK STATIONS. Sanitizing wipes and spray disinfectant (such as Formula 409) are available in the kitchen and in multiple other places around the Firm. Sanitize your keypad, mouse, telephone, coffee cup, chair arms, drawer handles, door handles, and all other surfaces that you frequently (and infrequently) touch, and repeat the process often. Electronic equipment must be disinfected per IT instructions. When you leave the office for the day, please keep your desk clear of all paper and other materials.

SHARED WORK SPACES. If possible, please do not share office equipment including your keypad, mouse, and telephone. If you must share equipment with another Helsell worker, please sanitize it immediately before use and immediately after use.

INTEROFFICE CONTACT. In an effort to limit close contact between workers, the Firm will temporarily implement a “no loitering” policy. Please limit in-person interoffice contact. Hallways and other communal spaces should be used on an as needed basis, which means we need to temporarily discontinue engaging in discussions in the kitchen, standing in hallways outside of offices, etc. During Phase 5, everyone should use their office phones and Teams messaging for interoffice communications, if possible.

COMMUNITY FOOD. Please do not bring in food to share with other Helsell workers, including but not limited to candy bowls, treats left in the kitchen, and/or snacks on the ledges outside staff cubicles.

PERSONAL DELIVERIES. No personal items or packages may be delivered to the office during Phase 5.

² This policy uses the word “please” in multiple sentences and such use is intended to denote an instruction in polite terms, not a request.

HIGH-RISK WORKERS. The Firm strongly encourages high-risk workers to telework to reduce the risk of exposure to COVID-19. High-risk workers are currently defined by the Centers for Disease Control and Prevention as: persons 65 years and older; people of all ages with underlying medical conditions (particularly not well controlled), including people with chronic lung disease or moderate to severe asthma, people who have serious heart conditions, people who are immunocompromised, people with severe obesity, people with diabetes, people with chronic kidney disease undergoing dialysis, and people with liver disease; people who live in a nursing home or long-term care facility. If you are a high-risk worker, please see Ann Callahan to discuss optional alternative work arrangements.

STAFFING. The Firm will divide non-high-risk employees into two or more groups and assign one or more groups to telecommute while one or more groups work in the office. The Firm is working on the details of such a staffing plan and will announce the specific plan prior to commencing Phase 5. All workers working in the office will be expected to work the same daily work schedule they had prior to Phase 1 of the Firm's COVID-19 response. All workers telecommuting will be expected to work the daily work schedule set forth in the Telecommuting Policy below.

REDUCED VISITOR HOURS. The Firm will be open to visitors only during the hours of 8:30 a.m. through 5:00 p.m. on all work days. Exceptions for special circumstances will be approved for good cause if arranged with the Firm Administrator at least two working days in advance. In turn, only during these hours will the reception desk be staffed and the elevators will come our floor without key card usage. Workers arriving before or after these reduced visitor hours will need their key cards to access our floor.

ILL AND EXPOSED WORKERS. The Firm expects workers who test positive for COVID-19, are diagnosed with COVID-19, and/or experience COVID-19 symptoms that cannot be explained by another medical condition (such as allergies, sinus infection, cold, influenza, etc.) to stay home and immediately seek medical attention. A worker who displays COVID-19 symptoms that cannot be explained by another medical condition (such as allergies, sinus infection, cold, influenza, etc.) will be sent home and should immediately seek medical attention and care. Such workers may not return to the office unless and until they have been cleared to work by their health care provider and they present to Human Resources Manager Ann Callahan a signed note from their health care providers confirming clearance to return to work.

- **Direct Exposure.** The Firm likewise expects workers who are or have been directly exposed to anyone who has tested positive for, have been diagnosed with COVID-19, and/or is experiencing COVID-19 symptoms that cannot be explained by another medical condition (such as allergies, sinus infection, cold, influenza, etc.) to stay home. Such workers may not return to the Firm's office until fourteen (14) days after the last date of

such exposure, provided they remain asymptomatic that entire time. When the exposure is to someone in the worker's household, the "last date of such exposure" will be the day the infected person's health care provider has cleared such person to return to work. Workers who experience symptoms of COVID-19 during the fourteen (14)-day period must seek and obtain medical attention, and may not return to the office unless and until they have been cleared to work by their health care provider and they present to Human Resources Manager Ann Callahan a signed note from their health care provider confirming clearance to return to work.

- **Notification.** If you must stay home under the foregoing circumstances, then you must notify the Firm of your positive test result, diagnosis, exposure (including last date of exposure), and/or unexplained symptoms by telephoning or emailing Human Resources Manager Ann Callahan at (206) 689-2135 or acallahan@helsell.com. Human Resources will follow up on your need for leave.

BUSINESS TRAVEL. As of the effective date of this Policy, the CDC has issued a global pandemic notice that recommends that all travelers avoid all nonessential international travel. In particular, there are four regions currently listed by the CDC as "Level 3" and where most foreign nationals who have been in one of those regions during the previous 14 days will not be allowed to enter the United States. Those five regions are China, Iran, most European countries, United Kingdom and Ireland, and Brazil. This Policy refers to these five regions, and any other regions which may hereafter be similarly elevated by the CDC, as "Elevated Level 3 Regions." The rest of the world, including the states in the United States, is listed by the CDC as "Level 3" but without restrictions on the entry to the United States ("Non-Elevated Level 3 Regions").

The Firm prohibits all business-related travel (whether essential or non-essential) to, in or through (even if only through an airport) a country, region or area identified by the CDC as a level higher than that which the United States is then classified. For example, at the moment, the United States is currently classified as a Level 3 (Non-Elevated) country. The Firm's prohibition against travel applies to all business-related travel (whether essential or non-essential) to, in or through (even if only through an airport) a country, region or area identified by the CDC as or included in an Elevated Level 3 Region. If and when the United States is classified as a Level 2 threat, the Firm's prohibition against travel will apply to all Elevated Level 3 Regions and Non-Elevated Level 3 Regions.

Any worker who travels for a business-related purpose outside the United States, must do the following:

1. Notify the Managing Partner of such travel plans in advance of the trip.

2. Confirm to the Managing Partner that the worker has verified the countries to which and through which the worker will be traveling are not countries that are identified as countries with higher threat levels than the United States. Confirmation must be made through review of the CDC current outbreak threat list found at the following URL: <https://www.cdc.gov/outbreaks/index.html>.
3. Confirm to the Managing Partner that immediately prior to the trip and frequently during the trip the worker will monitor the threat levels of the destination country as well as any countries through which the worker will travel, and confirm that the worker will be prepared to return home if the threat level of the destination country or any country through which such worker is traveling, increases above the threat level of the United States.
4. During the 14 days following the worker's return, the worker must continue to monitor the destination country as well as any countries passed through inbound or outbound and notify the Managing Partner if the threat level increases above the threat level of the United States.

Any worker who has traveled for a business-related purpose and who travels to, in or through a country, region or area that the CDC has identified as having a threat level higher than that of the United States, may not return to the Firm's office until fourteen (14) days after the date of return, provided the worker remains asymptomatic that entire time. If such worker experiences symptoms of COVID-19 prior to the end of such fourteen (14)-day period, the worker must seek and obtain medical attention and may not return to the office unless and until the worker has been cleared to work by a health care provider and the worker presents to Human Resources Manager Ann Callahan a signed note from their health care provider confirming clearance to return to work. During such fourteen (14)-day period, and while healthy, the worker is expected to work remotely from home.

BUSINESS TRAVEL BY CAR. The Firm prohibits more than one worker per vehicle for any business-related travel by car.

PERSONAL TRAVEL. Workers traveling for personal reasons to, in or through (even if only through an airport) a country, region or area identified by the CDC as having a threat level higher than the United States (which at the time of this Policy is Level 3 (Non-Elevated)), must notify the Managing Partner, Firm Administrator or Human Resources Manager of such travel.

Any worker who has traveled for personal reasons, travels to, in or through a country, region or area that the CDC has identified as having a threat level higher than that of the United States may not return to the Firm's office until fourteen (14) days after the date of return, provided the worker remains asymptomatic that entire time. If such worker experiences symptoms of COVID-19 prior to the end of such fourteen (14)-day period, the worker must seek and obtain medical attention and may not return to the office unless and until the worker has been cleared to work by a health care

provider and the worker presents to Human Resources Manager Ann Callahan a signed note from their health care provider confirming clearance to return to work. During such fourteen (14)-day period, and while healthy, the worker is expected to work remotely from home.

Communal Space Policy

Workers are expected to do the following:

ENTRY/EXIT

- **Sanitize Hands.** Upon entering the firm, each worker and visitor will be expected to wash or sanitize their hands.
- **Masks.** Workers will be expected to put their mask on prior to exiting the elevator onto the 42nd Floor and must wear masks in all areas including their own workstation or office.

KITCHEN. The kitchen has always been a communal space for workers to gather together for lunch, to read a book in solitude, or otherwise to engage in social interaction. Unfortunately, communal spaces must be closed or restricted to the extent possible. During Phase 5:

- **Eating.** No eating in the kitchen. Chairs and tables are removed for greater flow and spacing. If you remain inside the office during your lunch hour, you must eat at your desk (where you may remove your mask while eating).
- **Dishes.** The dishwasher is closed to all dishes and no dishes may be left in the sink. Disposable utensils, cups, bowls and plates will be available. The Firm will do its best to find products that are eco-friendly. Personal products such as mugs or utensils of your own, may be used but you must personally clean them and they must remain in your workspace.
- **Outside food.** You are encouraged to keep all food brought into the firm at your desk. If your food must be refrigerated, there will be plastic bags next to the refrigerator. Your outside food must be placed into a sealed Ziplock bag before being put into the refrigerator. All food must be removed by the end of the day. Any food remaining in the refrigerator at the end of visitor hours will be thrown out.
- **Refrigerator.** The refrigerator will no longer be available for condiments or other long-term items. The refrigerator will be emptied each night and disinfected. All items remaining in the refrigerator at the end of visitor hours will be thrown out.

- **Sanitizing.** Please sanitize the handle and buttons on any and all cabinets, drawers, appliances, doors, devices and other objects, including the microwave, refrigerator, beverage cooler, water dispensers, other appliances, coffee pots, Keurig coffee-maker, faucet, cabinets, drawers, First-Aid kit, etc., that you touch inside the kitchen after each usage or contact; or, alternatively, use a paper towel when touching to avoid direct contact by your hand. Loose paper towels will be available in the kitchen for this purpose.

HALLWAYS AND COPIERS

- **Hallways.** You will notice tape on the floors marking off personal space and designating walkways. Please stick to the designated walkways to allow those with workstations in open spaces to have a safe 6-foot perimeter free of foot traffic, and to funnel traffic to the copiers and to the backrooms in the most effective way.
- **Copiers.** To minimize touching of the copiers, to the extent possible, please (1) print to PDF rather than use the scanner; (2) print multiple copies rather than make copies; (3) use the same copiers rather than switch between different ones; and (4) refrain from using the copiers in the Office Services/Accounting room unless you are part of those teams. Please sanitize copiers after each use.

RESTROOMS

- **Good Hygiene.** Continue to practice good hygiene and wash hands for at least 20 seconds.
- **Inner Doors.** The inner doors leading into the bathrooms should remain propped open.
- **Outer Doors.** The outer door handles will be wiped down 2-3x per day. When entering a bathroom, everyone should use an elbow or forearm covered by clothing or a hand covered by a paper towel to avoid direct contact with the door. When exiting a bathroom, everyone should use a paper towel between hand and door handle when opening the outer door.
- **Paper Towels/Receptacle.** The bin outside the restrooms will remain available for you to dispose of the paper towel used in opening the outer door.
- **Men's Bathroom.** For physical distancing purposes, use of the left urinal in the men's bathroom will be discontinued.

RECEPTION

- **Drop Off/Pick Up Station.** The overflow bench-seating area next to reception (outside the Linden Room) has now been converted to a drop off/pick up station for messengers and packages. People should refrain from using the side of the reception desk for deliveries.
- **Personal Space.** There is a 6-foot area cordoned off around the reception desk, as marked by tape on the floor. All workers and visitors must remain outside that area to the extent possible.
- **Coffee Service.** Only disposable cups will be available to visitors.
- **Visitor Waiting Area.** When clients and other visitors arrive for a meeting, Reception will escort them directly into the conference room reserved for the meeting. The use of the chairs in the lobby area will be minimized to the greatest extent possible during Phase 5. The table in the reception area will remain empty of all papers, magazines, newspapers and other publications and items (except hand sanitizer).
- **Newspapers.** The Firm will discontinue its newspaper subscriptions during Phase 5.

CONFERENCE ROOMS

- **Capacity.** During Phase 5, conference room capacity is limited as follows:
 - 6 people in the Ballinger Room
 - 6 people in the Mentele Room
 - 4 people in the Hokanson Room
 - 4 people in the Library
 - 2 people in the Linden Room
- **Use.** The Ballinger and Mentele Rooms are reserved for attorneys with visitors, while the Hokanson and Linden Rooms and the Library are only available for internal meetings. Social distancing between visitors not from the same household must be maintained in all conference rooms by use of a barrier device (such as a “sneeze screen”) or by physical distancing of not less than 6 feet.
- **Coffee and Water Service.** Only disposable cups will be available.

- **Pens/Paper.** Disposable pens and paper will be available to guests. Guests can keep or throw away their pens after use.
- **Cleaning.** Conference rooms (tables and chairs) will be wiped down between uses.
- **AV Cart.** The touchscreen should not be used – only the keyboard/mouse. To minimize the number of people touching the monitor, only Keith, Central Services and Nathan should move the cart.

OFFICE SERVICES

- **Access.** With limited exceptions, access to the Office Services/Accounting room (“Office Services”) is restricted to only Central Services and Accounting staff. If you need office supplies, please email Central Services. Once each day, one team member will come by with a cart to provide you with your supply request and offer any additional supplies. Please do not go into Office Services to retrieve them yourself.
- **Printer/Copier.** The printer/copier in Office Services is reserved for Accounting and Central Services use only. Others should use the equipment closest to their office or work station.

CLEANING. At the end of each day and at times during the day, Central Services staff will clean multiple surfaces and objects in common areas (except bathrooms) that are frequently accessed or handled within the Firm. Such cleaning will be performed with anti-bacterial wipes and/or other disinfectant (such as Formula 409 cleaner spray). The targeted areas and objects for increased cleaning will include kitchen counters, conference room tables after use, reception desk and other surfaces, common area door handles, key pads, elevator buttons, refrigerator door handles, hot and cold water dispensers, copier key pads, and the like. This cleaning will supplement the cleaning by our building’s janitorial service, which has increased its cleaning efforts during the COVID-19 pandemic to the building manager’s Preparedness Manual, which includes increased cleaning procedures for public and tenant areas.

All workers must clean, disinfect and sanitize as stated elsewhere in this policy. In addition, workers must sanitize or disinfect their keypad, mouse, telephone, coffee cup, chair arms, drawer handles, door handles, and all the other surfaces in their workspaces that they frequently (and infrequently) touch, and repeat the process regularly with frequency. Frequent use of the copy machines makes it difficult, if not impossible, for Central Services to disinfect these keypads often

enough. Please make every effort to clean off the key pad after using any copy machine. Sanitizing wipes are available near each copier.

Visitor Policy

All clients, vendors, deliveries, contractors, and other visitors must wear a mask or other cloth face covering at all times while they are in the Firm's office. If they do not have a mask or other cloth face covering, a mask will be provided by the Firm. With the exception of pre-authorized Firm vendors and contractors, anyone who is not a Helsell worker, including clients and visitors, will be limited to the Firm's reception lobby, elevator lobby (including restrooms) and conference rooms. The Firm will post signage in the lobby of its office advising visitors to wear face coverings in the Firm's office

On a case-by-case basis, the Firm will consider exceptions to the foregoing visitor mask requirements, provided that other, sufficient precautionary measures set by the Firm are observed and maintained. In considering requests for such exception, the Firm will be guided by the exceptions set forth in Section B of the Seattle & King County Public Health Directive, issued on May 11, 2020, on wearing face coverings. No exception will be made for any individual not described in such Section B. Meetings involving anyone outside of the Firm are to take place in either the Ballinger or Mentele Rooms. If neither is available, please schedule the meeting to take place in the large and/or small conference rooms on the 3rd floor. When using the 3rd floor, Helsell workers and visitors must wear a mask (or other cloth face covering) and maintain a 6-foot open perimeter.

The Firm may require or request each visitor, before entering the Firm's office, to submit to a screening kiosk, which includes facial recognition and temperature scanning. Visitors may be registered into the screening kiosk system for purposes of the firm's logging those who arrive at and/or remain in the office each day.

Telecommuting Policy

ELIGIBILITY. All high-risk employees are eligible to telecommute (work from home) full time during Phase 5. The Firm will group all non-high-risk employees into two or more groups for purposes of rotating personnel between working in the office and telecommuting. The Firm is working on the details of such a staffing plan and will announce the specific plan prior to commencing Phase 5.

This Telecommuting Policy applies to all workers who telecommute during our Phase 5 response. Telecommuting will not change salaries, benefits, job responsibilities, paid leave policies or the other basic terms of employment. The Firm has the right to modify workplace assignment without cause or advance notice.

OFFICE STAFFING. In addition to normal work responsibilities, staff members working in the office may be asked to assist staff members who are telecommuting at the time with tasks that require a worker to be physically in the office. Such assistance will not take priority over pressing matters the staff member in the office is already tending to.

AVAILABILITY. While employees and supervisors have the freedom to develop arrangements tailored to employee and departmental needs, the following basic requirements must be met:

- To the extent possible, employees must carry out the same duties, assignments, and other work obligations in their home offices as they do when working in the office.
- All non-exempt employees will be on the same schedule of 8:30 a.m. to 5:00 p.m., regardless of the hours an employee may maintain when working in the office.
- Telecommuting employees must be available and responsive to their supervisors and co-workers between 8:30 a.m. and 5:00 p.m., except that all non-exempt telecommuting employees must take one 15-minute break in the morning, one 15-minute break in the afternoon, and one 1-hour lunch break from 12:00 p.m. to 1:00 p.m.
- Telecommuting employees must be available to attend scheduled meetings and participate in other required office activities from their home offices as needed.

VPN AND EQUIPMENT. To qualify for telecommuting, the employee working from home must have high-speed internet service available at the employee's expense. Such internet service must interface with the Firm's virtual private network (VPN) and the employee's connection to the Firm's VPN must be the only virtual private network accessed during the time the Firm's VPN is open. The Firm will not provide support for anyone's internet service. If such internet service becomes unavailable for any reason, or if a VPN connection cannot be opened or maintained, the employee will be expected to work in the office until connectivity problems are resolved.

A worker telecommuting with a home personal computer must connect to the Firm's VPN while working. Prior to telecommuting, each employee who will telecommute must confirm with the Firm's IT Manager that the employee has the ability to connect to the Firm's network via VPN while telecommuting. If the employee has no way of connecting to the network via VPN while telecommuting, the employee must see the IT Manager to check out a laptop (if one is available) for home use. If an employee uses a laptop inside the Firm, the employee must take their laptop home.

The Firm prohibits all workers from utilizing the Firm's internet connection for non-essential streaming of video or audio services. (Any internet access from a computer connected to the Firm

via VPN will be through the Firm's internet connection.) The Firm does not prohibit workers from "in and out" non-essential access to the Firm's internet connection for checking news, weather, sports, bus schedules, traffic, and the like. However, in and out access does not include "surfing" the world wide web. The Firm will monitor overall internet usage for purposes of determining whether VPN capabilities are being compromised by non-essential access to the internet, and the Firm reserves all rights, in its sole discretion, to prohibit all non-essential utilization of the Firm's internet access, including for in and out access.

Employees are responsible for maintaining their home offices so that they can accomplish their work in an efficient and expeditious manner. Employees are responsible for providing office furnishings, such as desks, chairs, file cabinets, and lighting at their own expense. Employees are also responsible for having a quiet work place free from personal distractions. The Firm will provide common office supplies, such as paper, pencils, pens, and paper clips, and a second monitor and, for laptop usage, a keyboard and mouse, for employees' use in their home offices. The Firm will consider and evaluate requests that it supply other equipment and supplies for a home office on a case-by-case basis.

SAFETY. Telecommuting employees must maintain a safe work environment and must report work-related injuries to Human Resources at the earliest opportunity.

SECURITY. Workers must keep client and other confidential information and Firm equipment and materials in a secure location. Workers must not use, or allow others to use, Firm equipment for purposes other than Firm business.

DOCUMENTATION. Employees who telecommute must document time used for regular work and record personal time such as PTO or other leave as appropriate, in the same way as the employee would do if working in the office.

The Firm has the right to cancel or suspend employee telecommuting privileges without cause or advance notice.

Miscellaneous

COMMUNICATIONS. The Firm will strive to communicate in an open and transparent manner concerning COVID-19 and the steps we take to address the virus.

- **Outside authorities.** The Firm works with local, state, and federal emergency-response and health agencies to ensure legal compliance with emergency-response protocols. The Firm will coordinate efforts to maintain safety and security in and outside the workplace. In the event of a conflict between directives issued by Helsell Fetterman and directives

issued by local, state, or federal authorities, Helsell Fetterman directs all workers to obey all orders issued under local, state, or federal law.

- **Other media channels:** In an emergency, the Firm utilizes outside resources to coordinate dissemination of instructions or other important information as quickly as possible to all workers. The Firm communicates with workers via its emergency text messaging system, message on the Firm's worker information voice message line, and by email.

COVID-19 SUPERVISOR. The Firm designates Scott Collins and Nathan Watson, the Firm's Managing Partner and Firm Administrator, respectively, as its COVID-19 Supervisors who each shall hold overall responsibility for the health of the Firm's workers and visitors and the implementation and enforcement of this Policy.

STATE-ISSUED REQUIREMENTS. On May 13, 2020, Washington State Governor Jay Inslee issued Phase 2 Professional Services COVID-19 Requirements (the "Requirements"). This Policy is intended to comply fully with and implement all requirements for the Firm under the Requirements. The Firm will administer and interpret this Policy and its obligations in accordance with the Requirements and any amendments or other orders and rules issued thereunder or related thereto. Any provision of this Policy that is determined not to comply with the Requirements shall be deemed modified so as to fully comply as of the effective date of this Policy.

DISCIPLINE. Anyone who violates this Policy will be subject to disciplinary action, up to and including termination.

SUBJECT TO CHANGE. The challenges presented by COVID-19 are evolving as the virus spreads and develops. The more we learn about the virus, steps we take to addressing it will evolve. The Firm will maintain flexibility in addressing COVID-19 and our workplace safety as well as in applying this Policy. As a result, this COVID-19 Policy is subject to change, particularly if the CDC, WHO, Public Health, Governor Inslee or other authorities or officials provide new, different, and supplemental guidance for the Firm and its response to COVID-19.