

COVID-19 Policy

Adopted March 4, 2020

Purpose

Hellsell Fetterman LLP (the “Firm”) strives to provide a safe and healthy workplace for all employees, but our safety and health are endangered by the aggressive, international spread of the CoronaVirus Disease 2019 (COVID-19), the illness caused by a new coronavirus known as SARS-CoV-2. COVID-19’s potential adverse impact on our workplace also threatens to affect the Firm’s ability to deliver legal services to its clients, meet its professional responsibilities, and otherwise operate and function as desired.

This COVID-19 Policy outlines our overall response to the local outbreak of COVID-19 and our emergency-preparedness and business continuity plan. It outlines specific steps Hellsell Fetterman takes to safeguard employees’ health and well-being during the COVID-19 outbreak, while ensuring Hellsell Fetterman’s ability to maintain essential operations and continue delivering legal services to our clients and otherwise meeting our professional responsibilities. In addition, This Policy provides guidance on how we intend to respond to specific operational and human resource issues that may arise in the course of our addressing COVID-19.

This Policy is intended to be limited in duration to the COVID-19 outbreak and will terminate when COVID-19 no longer poses a significant threat to the safety and well-being of our workplace and employees. This Policy is intended to supplement, and not replace:

- applicable federal, state and local laws, regulations or rules pertaining to employer responsibilities and duties, employee benefits and treatment, occupational injuries or illness, leave requirements, and the like, including (without limitation) the federal Family and Medical Leave Act (“FMLA”), the state Paid Family and Medical Leave (“PFML”), Workers Compensation, federal Occupational Safety and Health Act (“OSHA”), the Washington Industrial Safety and Health Act, the Seattle Paid Sick and Safe Time law, and other labor and employment standards promulgated by the federal, state and local governments.
- the many other policies of the Firm that may have application in the context of COVID-19 and the Firm’s response thereto, such as our policies addressing the Americans with Disabilities Act, Attendance and Tardiness, Injury or Illness on the Job, Personal Information and Records, Emergency Closing, Technology Policies, Compensation and Pay Policies, Paid Time Off for Non-Attorney Personnel, Associate Paid Time Off, Privacy, and the like.
- the Washington Rules of Professional Responsibility and other applicable standards of care and best practices governing and addressing the conduct of lawyers and law firms in the delivery of legal services and the operation of law practices.

If any portion of this Policy conflicts with the foregoing laws, regulations, rules and other policies, the requirements of those laws, regulations, rules and other policies shall take

precedence, with the goal, if possible, of applying everything in an effort to serve the purposes and goals of this COVID-19 Policy.

COVID-19 Defined

The federal Centers for Disease Control (CDC) are responding to an outbreak of respiratory disease caused by a novel (new) coronavirus that was first detected in China and which has now been detected in many countries around the world, including in the United States. The virus has been named “SARS-CoV-2” and the disease it causes has been named “coronavirus disease 2019” (abbreviated “COVID-19”).

The vast majority of the illnesses are mild, with symptomatology of fever and cough. A much smaller percentage of cases are severe and involve pneumonia and other severe breathing difficulty, particularly in elderly people and people with underlying medical conditions. Sadly, as of the issuance date of this policy (March 4, 2020), nine people in King County have died from causes related to COVID-19, and many others are displaying symptoms and/or test positive for COVID-19. The number of people who become ill with COVID-19 is expected to grow dramatically in the coming weeks, and it is important that everyone take steps at work, at home and in between to reduce the spread of COVID-19.

Symptoms: People who have been diagnosed with COVID-19 have reported symptoms that may appear in as few as two days or as long as fourteen days after exposure to the virus. The common symptoms are fever, cough and/or difficulty breathing. If you or a member of your household have been exposed to someone who has the virus or if you are experiencing symptoms, call your health care provider. Do not go into a medical facility without first calling. The facility will provide you with instructions as to where to go and how to check yourself in. Your health care provider will make an assessment about next steps. If it is determined that you should be screened for coronavirus, your health care provider will contact Public Health to make arrangements for screening.

Testing: As of the date of issuance of this Policy (March 4, 2020), testing for COVID-19 and locations of testing sites are rapidly evolving matters as the federal, state and local government and local health care providers ramp up their responses to COVID-19. If you are exhibiting the symptoms of COVID-19 that you cannot attribute to another known medical condition (such as allergies, sinus infection, cold, influenza, etc.), particularly if you have traveled to a country, region or area identified by the CDC as a Level 3 or Level 2 threat for COVID-19 or you have been directly exposed to another person who has tested positive for or been diagnosed with COVID-19, the Firm urges you to seek medical attention and testing for potential COVID-19 infection. If you have any questions about symptoms you are experiencing or medical treatment or testing, please call your health care provider (before going to the health care provider’s office). As an additional resource, you may call the Nurseline available under our Firm’s employee benefits plan at 1-800-297-6877 or 206-630-2244 (TTY 711) and a nurse will help and guide you in assessing your possible risk, as well as managing your symptoms and care.

Epidemic vs. Pandemic

On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization declared the outbreak a “public health emergency of international concern” (PHEIC). On January 31, 2020, U.S. Health and Human Services Secretary Alex M. Azar II declared a public health emergency (PHE) for the United States to aid the nation’s healthcare community in responding to COVID-19. On February 29, 2020, after the first COVID-19-related deaths in the United States occurred here in King County (since followed by more deaths), Washington Governor Jay Inslee declared a state of emergency, directing state agencies to use all resources necessary to prepare for and respond to the outbreak.

The World Health Organization (“WHO”) has, at the time of issuance of this policy (March 4, 2020), declared COVID-19 to be an “epidemic,” which is considered a regional outbreak of an illness that spreads unexpectedly. WHO has thus far stopped short of calling COVID-19 a “pandemic,” which is considered a “worldwide spread of a new disease” that affects large numbers of people, although most experts view it as only a matter of time before COVID-19 is officially declared a pandemic. Whether COVID-19 is characterized as an epidemic or a pandemic may result in different approaches to the health crisis. An epidemic suggests that the virus may be geographically limited, and that intervention by health agencies could help stop the spread. Faced with a pandemic, authorities may change their focus from attempting to prevent the virus from entering a country to treating illness and protecting vulnerable people.

Pandemic illnesses also pose serious global threats to our economy and the ability to engage in commerce. The outbreak will cost billions of dollars in productivity losses worldwide resulting from absenteeism, payouts of sick leave or workers’ compensation, and lost business; disrupt transportation and communication services on which we all depend; and impede delivery of necessary goods and services. Given that we are on the brink of a pandemic, with severe health and economic consequences likely to occur, it is incumbent on the Firm to address COVID-19 and the health and safety of our employees, our workplace, and our operations with significant steps intended to have meaningful, positive results.

Infection-Control Measures

Helsell Fetterman takes a number of steps to minimize, to the extent practicable, exposure to and spread of infection in the workplace, which is an ideal site for contagion because of workers’ close proximity to one another. As appropriate, the Firm recommends measures that employees can take to protect themselves inside and outside the workplace and encourages all workers to discuss their specific needs with a family physician or other appropriate health or wellness professional.

Stay Healthy: Everyone must take personal precautions to stay healthy:

1. Personal Precautions: The CDC recommends:

- Frequently wash hands with soap and water for 20 seconds, or use alcohol-based sanitizer if no water is available
- Avoid touching eyes, nose, and mouth with unwashed hands
- Avoid close contact (within 6 feet) with those who are sick
- Stay home if you are sick – that means if you are coughing, sneezing, sniffing, having difficulty breathing, or have a fever, stay home and call in sick
- Cover cough or sneeze with tissue, throw tissue in trash, wash hands
- 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

2. Sanitize Your Hands: You will find hand sanitizer in multiple places around the Firm. Sanitize your hands regularly with frequency.

3. Sanitize Your Work Station: Sanitizing wipes and spray disinfectant (such as Formula 409) are available in the breakroom and in multiple other places around the Firm. Sanitize your keypad, mouse, telephone, coffee cup, chair arms, drawer handles, door handles, and all the other surfaces that you frequently (and infrequently) touch, and repeat the process regularly with frequency.

4. Mask Your Face: If you have a cough or sneeze that is not attributed to allergies, please stay home. If you have a cough or sneeze that is attributed to allergies, or for some reason you cannot stay home, then wear a mask to contain your germs. There are masks in the breakroom on top of the first aid box.

5. Use Your Elbows: If you cough or sneeze without a mask, use a tissue to catch your germs. If you don't have a tissue handy, use your elbow. If you use your hand(s) to contain a cough or sneeze, wash your hands right away without touching anything in the meantime.

6. Consume Vitamin C: Vitamin C has been proven to boost immunity. The Firm has stocked Emergen-C, Airborne, Orange Juice and other Vitamin C-laden juices in the breakroom.

7. Healthy Lifestyle: You should maximize a healthy lifestyle to boost immunity and to fight illness. Eat healthy foods, stay hydrated, get plenty of sleep, get plenty of exercise, and manage your stress to keep your immunity strong.

8. Stay Informed. Information is changing frequently.

People at Higher Risk: On March 4, 2020, Public Health for Seattle and King County issued guidance for people at higher risk for severe COVID-19 illness. Public Health recommends that people at higher risk of severe illness should stay home and away from large groups of people as much as possible, including public places with lots of people and large gatherings where there will be close contact with others. This includes concert venues, conventions, sporting events, and crowded social gatherings. People at higher risk include people:

- Over 60 years of age
- With underlying health conditions including heart disease, lung disease, or diabetes
- With weakened immune systems
- Who are pregnant

Anyone who has questions about whether their condition puts them at risk for COVID-19 should consult with their healthcare providers.

Cleaning: At the end of each day, our Central Services staff does an outstanding job of cleaning multiple surfaces in the breakroom and dishes, cups and utensils used during the day, and our building's janitorial service cleans other surfaces around the office. Effective immediately, the Firm will increase its level of cleaning common areas and objects 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, kitchen tables, conference room tables, 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.

Effective March 1, 2020, the building's management, Hines, proactively implemented steps and guidance provided in the Hines Pandemic Preparedness Manual, which includes increased cleaning procedures for public and tenant areas. The building's janitorial service was notified of such implementation and is expected to follow the manual's guidelines for increased cleaning procedures.

Employees should take additional precautions. Please wash or sanitize your hands each time you enter or return to the office before you contact any surfaces. Employees entering through the secured, locked door near the breakroom are encouraged to use their key cards (badges) in lieu of using the keypad and to gently "elbow" or "knuckle" the automatic door-opening button in lieu of pulling the door handle. As stated above, sanitizing wipes and disinfectant spray are available in the breakroom and in multiple other places around the Firm. Please sanitize your keypad, mouse, telephone, coffee cup, chair arms, drawer handles,

door handles, and all the other surfaces that you 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 before and after you use any copy machine. Sanitizing wipes are available near each copier.

Social Distancing: Social distancing measures aim to reduce the frequency of contact and increase physical distance between persons, thereby reducing the risks of person-to-person transmission of the virus. Practice social distancing both inside and outside the Firm. For example, if you are seated on a bus next to someone who is coughing, it is socially acceptable to move to another seat away from that passenger. When you greet someone, refrain from shaking hands. The World Health Organization recommends that you keep one yard or meter of social distance from others.

Ill and Exposed Employees: Helsell Fetterman expects employees 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. An employee 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 employees may not return to the office unless and until they have been cleared to work by their health care providers and they present to Human Resources Manager Ann Callahan a signed note from their health care providers confirming clearance to return to work.

The Firm likewise expects employees 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 employees 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 employee'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. Employees 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.

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) 689-32135 or acallahan@helsell.com. Human Resources will follow up on your need for leave.

Personal-protection equipment: To the extent practicable, Helsell Fetterman will maintain on site supplies of recommended personal-protection equipment, such as face masks, anti-bacterial soap, anti-bacterial hand gels and wipes, and disinfectant spray. All employees are

urged to speak with their personal physician about types and proper use of personal-protection equipment at home.

Visitors: Employees should exercise common sense and caution when inviting visitors into the Firm for meetings and other activities. Employees inviting visitors into the Firm should consider inquiring in advance of a visit whether the visitor has tested positive for or been diagnosed with COVID-19, traveled in the past two weeks to a country identified by the CDC as a Level 3 or Level 2 threat (currently as of March 4, 2020, China, Italy, Iran, South Korea and Japan), or been in direct contact with another person known to have tested positive for or been diagnosed with COVID-19. An affirmative response to any such inquiry should be met with a disinclination into the Firm.

To the extent reasonably available for purchase, hand sanitizer and face masks will be placed in the Reception area in a visible location and will be accompanied by a sign inviting visitors to apply sanitizer to their hands and, if they are experiencing any symptoms such as coughing, sneezing, sniffing, fever, or difficulty breathing, to don a face mask. The employee greeting and meeting with visitors should make an assessment whether any further precautions should be suggested and, if so, to take the proactive lead on making such suggestions. If during the course of a visitor meeting, an employee learns information that suggests the visitor may have or been exposed to COVID-19, the employee should inform Human Resources Manager Ann Callahan immediately.

The receptionist on duty has no responsibility to assess or report on any visitor coming to our office beyond the standard reporting of arrival. That responsibility is solely on the employee inviting such visitor.

Remote Work

Helsell Fetterman acknowledges that during the COVID-19 outbreak, local, state, or federal authorities may prohibit or severely curtail individuals' access to and use of public services and public transportation; close or prevent access to buildings or public highways; isolate or quarantine buildings' occupants; and prevent inter- or intrastate delivery of goods and services. We cannot predict and have no control over such authorities' actions and acknowledge our legal duty to comply with outside authorities' directives.

In addition, illness or exposure of an employee or a household member, closing of a school, or other circumstances or events may prevent an employee from coming into the Firm's office to work. Such circumstances or events may occur at any time and without warning, and employees need to prepare in advance for such circumstances and events. In order to preserve and perpetuate the Firm's operations and delivery of legal services, all employees must immediately be prepared to work remotely via Virtual Private Network (VPN) or other approved connection to the Firm's network. Employees should see IT Manager Keith Hastreiter regarding connecting to the network remotely.

Effective immediately, each employee must:

- Confirm you that you have the ability to connect to the Firm’s network via VPN from home. If you are not sure, please see Keith Hastreiter for information or confirmation.
- If you use a laptop inside the Firm, you must take your laptop home with you each evening in case you are unable to return to the office the next day.
- If you have no way of connecting to the network via VPN at home, please see the IT Manager to check out a laptop that you can take home with you each evening.

Moreover, while the Firm maintains robust bandwidth for internet into and out of the Firm to accommodate multiple users accessing the Firm’s network via VPN, the available bandwidth is not boundless and VPN access strains our internet speed, power and capacity. Because remote access via VPN to the Firm’s network during the COVID-19 outbreak must be our priority to maintain our capabilities of delivering legal services to our clients and our essential business operations, non-essential internet usage must be curbed, if not eliminated. Effective immediately, the Firm prohibits all employees from utilizing the Firm’s internet connection for non-essential streaming of video or audio services.

The Firm does not prohibit employees from “in and out” access to the Firm’s internet connection for checking news, weather, sports, bus schedules, traffic, and the like. “In and out” access refers to opening an internet browser, searching for and/or accessing the desired website, reading the information sought, and closing the browser when done. In and out access does not include “surfing” the world wide web. Please note that the Firm will monitor our 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.

When an employee is working from home because the employee has tested positive for or been diagnosed with COVID-19, or the employee is home during one of the fourteen (14)-day periods referenced in this Policy, then the Firm will not forward hard copies of files to such employee unless such hard copies will be destroyed prior to the employee’s return to the Firm’s office.

Employee Work Options and Pay

Employees unable to come into the office for any reason under this Policy but who work from home will be paid in full for that day without need for PTO (or other benefit). This is true for anyone who is home during the term of this Policy due to any illness, whether COVID-19-related or not, and can and does work from home.

The Firm recognizes that there are certain positions in the Firm (such as reception and Central Services) which have little, or no, ability to perform work functions remotely from home. Employees holding such positions shall do as much as they can (which may be very little)

remotely from home on days when they are unable to come into the office for any reason under this policy, with the understanding that they will be paid in full for that day without need for PTO (or other benefit), *provided that* the reason such person is at home that day is not due to illness of a family member (in which case PTO or other benefit must be used).

Employees unable to come into the office due to illness or medical treatment of the employee or a family member, and who do not work that day, must use PTO or other benefit for that day. In addition, if applicable and when eligible, such employees may have rights and benefits under Washington's Paid Family Medical Leave (PFML), the federal Family Medical Leave Act (FMLA), and/or the Firm's long-term disability plan, as more fully set forth in other policies of the Firm. Employees should see Human Resources Manager Ann Callahan for further details and to provide any required notification to invoke or apply for such benefits.

In all, the Firm encourages employees who become ill with COVID-19 to seek and obtain the medical attention and care they need to get better. Such medical care and recovery have to be the ill employee's top priority.

Business Travel

Effective immediately, Hellsell Fetterman prohibits all business-related travel to, in or through (even if only through an airport) a country, region or area identified by the CDC as a Level 3 or Level 2 threat (currently as of March 4, 2020, China, Italy, Iran, South Korea and Japan), unless such travel is expressly authorized in writing in advance by the Managing Partner. Alternative means of communication should be utilized in lieu of such travel, or the trip should be delayed until the COVID-19 outbreak has concluded or subsided to the point where the CDC downgrades or removes the country, region or area from its Level 3 or Level 2 threat lists. Prior to any business-related travel to, in or through a location outside the United States, the employee must confirm immediately prior to departure and again immediately prior to returning that any such travel will not occur in, to or through a country, region or area identified by the CDC as a Level 3 or Level 2 threat. Such 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>.

The Firm further prohibits all non-essential business travel to, in or through other locations outside the United States without the prior written authorization of the Managing Partner. Any travel by an employee outside the United States for essential business purposes must report the travel in advance to the Managing Partner or Firm Administrator. Any employee who travels to or in a country, region or area that the CDC identifies as a Level 3 or Level 2 threat while the employee is there, must leave the country, region or area as soon as practicable and return home. Upon returning home, such employee may not return to the Firm's office until fourteen (14) days after the date of return, provided the employee remains asymptomatic that entire time. If such employee experiences symptoms of COVID-19 prior to the end of such fourteen (14)-day period, the employee must seek and obtain medical attention and may not return to the office unless and until the employee has been cleared to work by a health care provider and the employee presents to Human Resources Manager Ann Callahan a signed note from the employee's health care provider confirming clearance to return to work. During such

fourteen (14)-day period, and while healthy, the employee is expected to work remotely from home.

Personal Travel

Employees traveling for personal reasons to, in or through (even if only through an airport) a country, region or area identified by the CDC as a Level 3 or Level 2 threat, must notify the Managing Partner, Firm Administrator or Human Resources Manager of such travel in advance of returning to the Firm's office. Prior to any such personal travel to, in or through a location outside the United States, the employee must determine immediately prior to departure and again immediately prior to returning whether any such travel will occur in, to or through a country, region or area identified by the CDC as a Level 3 or Level 2 threat. Such determination must be made through review of the CDC current outbreak threat list found at the following URL: <https://www.cdc.gov/outbreaks/index.html>.

Any employee who while traveling for personal reasons, travels to, in or through a country, region or area that the CDC has identified as a Level 3 or Level 2 threat may not return to the Firm's office until fourteen (14) days after the date of return, provided the employee remains asymptomatic that entire time. If such employee experiences symptoms of COVID-19 prior to the end of such fourteen (14)-day period, the employee must seek and obtain medical attention and may not return to the office unless and until the employee has been cleared to work by a health care provider and the employee 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 employee is expected to work remotely from home.

Emergency-Contact Information

Employees are required to notify their immediate supervisor and the Human Resources Manager of any change in emergency-contact information within two weeks of the change. When providing such information, employees, especially those who have children or care for elderly relatives, should identify individuals on whom they can depend if the employees themselves become sick at work and must be isolated and quarantined.

Special needs and accommodations: Hellsell Fetterman is required by law to notify first-responders about employees with medical conditions who could be compromised in the event of a pandemic. Hellsell Fetterman urges such employees to confidentially self-identify to Human Resources Manager Ann Callahan so that she is aware of and can prepare for you to receive any special medical expertise you might require if you become severely ill on the job. The Human Resources Manager will maintain the confidentiality of any information you provide, making it available solely on a need-to-know basis and only when needed by emergency-responders.

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: Helsell Fetterman 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 employees to obey all orders issued under local, state, or federal law.

Other media channels: In an emergency, Helsell Fetterman utilizes outside resources to coordinate dissemination of instructions or other important information as quickly as possible to all employees. Helsell Fetterman communicates with employees via Helsell Fetterman's emergency text messaging system, message on the Helsell Fetterman employee information line, and by email.

Discipline

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

Subject to Change

The challenges presented by COVID-19 are evolving as the virus spreads. 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, King County Public Health or other authorities or officials provide new, different, and supplemental guidance for the Firm and its response to COVID-19.