



25 May 2020

COVID-19 Risk Assessment & Mitigation Plan

for

PEACE | CROWELL
Limited Liability Partnership

Introduction

Coronavirus Disease 2019 (**COVID-19**) is a new illness that can affect a person's lungs and airways, and potentially other organs and systems of the human body. The virus that causes this disease is called the severe acute respiratory syndrome coronavirus 2 (**SARS-CoV-2**) and belongs to a family of viruses known as coronaviruses, which are responsible for diseases ranging from the common cold to more serious illnesses like the Middle East Respiratory Syndrome and the Severe Acute Respiratory Syndrome. Epidemiologists are beginning to believe that SARS-CoV-2 may be among the most virulent pathogens in circulation among the human population today, and may be unique in its ability to attack cells of multiple organs and tissue types in the human body. There are now reports that SARS-CoV-2 may be able to attack cells in the human heart, blood vessels, brain, kidneys and skin, among others. Symptoms of COVID-19 can be mild, moderate, severe or fatal.

It is important to note that the vast majority of infected patients recover and return to full health, and some defeat the virus without exhibiting a single symptom or even knowing that they have ever been infected. The mysteries surrounding this disease remain significant, but enough is known for Peace | Crowell (the **firm** or **P|C**) to take proactive measures to keep its personnel safe and prepare for re-opening. In fact, as national and local governments in the firm's respective office locations seek to "re-open" their economies, this risk assessment seeks to cover both of the firm's offices in a manner that is compliant with the relevant regulatory and legal requirements in effect in both locations, London and San Diego.

The firm's offices in both the United Kingdom and the United States are similarly situated as largely open-plan spaces, with the ability to ensure that employees are seated at workstations at least 2 meters (6½ feet) apart (or in limited circumstances where this is not possible, that personnel are separated by appropriate physical barriers), and with limited enclosed offices and common facilities, including a meeting room in each office, common restroom facilities, and common kitchen areas. From that perspective, firm management believes the risks presented from this new viral threat are the same in both of our locations. What follows below is a table that identifies and discusses various risks and control that the firm believes will address the threat, together with a list of pre-reopening actions the firm will take at each of its office locations in order to ensure that its offices are ready for reopening.

Background Information – How is the Virus Spread and Where and How People are Getting Sick

In order to effectively protect from viral transmission, the firm's management believes it is important for all personnel to understand the basic science of viral infection and what patterns of infection epidemiologists are observing in affected communities. It is important to note that SARS-CoV-2 is a new virus and relatively little is known about it, but scientists are learning more and more each day. As governments begin to lift restrictions and allow businesses, including the firm, resume in-office activities, the firm will take into consideration credible published science and report any new important information to P|C personnel. The information provided in this risk assessment and mitigation plan is presented by firm management based upon the best available information and understanding of firm management; however, neither any of the firm's members nor any of its management team are experts in the science of viral transmission and no representation is made as to the accuracy or completeness of this information – it is provided for convenience and to demonstrate the firm's efforts in understanding and

considering all available, published scientific research and information in devising a risk mitigation plan to protect the health and welfare of P|C personnel. In other words, firm management is doing its best, taking advantage of published government guidance and going beyond that to consider credible scientific research on the transmission of SARS-CoV-2 to develop a common plan and strategy for gradually re-opening both firm offices with the health and safety of P|C team members as the firm's highest priority. Unfortunately, as at the writing of this risk assessment and mitigation plan, government guidance in some of the firm's locations is limited or appears to not fully consider all available scientific information, and as such the firm is taking a more conservative approach than published government guidance requires and is working hard to ensure that a common set of controls and actions based on epidemiological science can be applied in both firm locations while also ensuring compliance with the different legal requirements that apply in both locations. In particular, the firm considers the scientific information below in preparing this risk assessment and mitigation plan.

How the Virus Spreads

Scientists report that in order to become sick, a person must be exposed to an 'infectious dose' of the virus, and some experts estimate that as few as 1,000 SARS-CoV-2 infectious viral particles are sufficient for an 'infectious dose'. Based on this assumption, infection could occur through 1,000 infectious viral particles inhaled in one breath, or from one eye-rub after picking up 1,000 or more viral particles after touching a contaminated surface, or from 100 viral particles inhaled with each breath over 10 breaths, or from 10 viral particles inhaled with each breath over 100 breaths, etc.

Scientists know that most people get infected in their own home – one family member contracts the virus in the community and brings it into the house where sustained contact between household members leads to household infection.

Outside of the home, there are two common mechanisms of viral transmission. The first is by way of 'fomite transfer' through touching contaminated surfaces, following which the exposed person rubs his or her eyes or face before washing or sanitizing his or her hands. With this in mind, bathrooms must be treated as high risk areas because they have many high touch surfaces.

The other principal avenue of infection outside of the home is through inhalation of aerosolized droplets containing viral particles. Scientists report that an infected person can release as many as two hundred million (200,000,000) virus particles in a single cough or sneeze. With a cough, approximately 3,000 droplets containing those hundreds of millions of virus particles are released and, because they are large droplets, most fall to the ground quickly. With a sneeze, 30,000 tiny droplets are dispersed and can travel great distances to easily fill an entire room with hundreds of millions of airborne virus particles.

On the other hand, a single breath from an asymptomatic carrier of the virus might release 50 to 5,000 droplets, depending on how heavy the breath is, and most of those droplets are large, low velocity droplets that fall to the ground quickly. Unlike coughing and sneezing, these droplets contain relatively few virus particles – scientists believe that this may equate to somewhere around 20 to 35 virus particles per minute when the infected person is breathing normally, assuming SARS-CoV-2 behaves similarly to influenza in relation to viral shed. If the infected person begins speaking, viral shed increases as much as ten (10) times. All of this means that a person would need to be exposed to an asymptomatic carrier's exhaled breath for somewhere between 5 minutes to one hour in order to receive sufficient viral exposure to become sick (assuming no mitigation and that the exposed person is within the reach of the sick person's aerosolized viral particles).

Who Spreads the Virus

Sick individuals exhibiting COVID-19 symptoms are clearly contagious and will spread virus particles into the environment around them. Those symptoms of COVID-19 appear 2-14 days after exposure to the virus and include:

- Cough
- Shortness of breath or difficulty breathing
- Fever / high temperature
- Chills
- Muscle pain

- Sore throat
- New loss of taste or smell
- Sometimes, but less frequently than the other symptoms, gastrointestinal problems like nausea, vomiting and diarrhea

Anyone exhibiting any symptoms of COVID-19 should self-isolate and seek medical attention. While individuals sick with COVID-19 should avoid all forms of contact outside of controlled hospital environments equipped to treat COVID-19 patients, special care must be taken in particular to avoid coming in contact with people at higher risk of death or serious adverse symptoms.

People at high risk of developing severe COVID-19 disease, and who are therefore at higher risk of death as a result of infection by SARS-CoV-2, include people who have any of the following risk factors (the **Clinically High Risk Group**):

- are 70 or older
- are pregnant
- have a lung condition (such as asthma, COPD, emphysema or bronchitis or cystic fibrosis)
- have heart disease (such as heart failure)
- have diabetes
- have chronic kidney disease
- have liver disease (such as hepatitis)
- have a condition affecting the brain or nerves (such as Parkinson's disease, motor neuron disease, multiple sclerosis or cerebral palsy)
- have any condition that puts them at a high risk of getting infections (especially high risk conditions such as SCID or sickle cell)
- are taking medicine that can affect the immune system (such as steroids or drugs to treat autoimmune diseases such as ankylosing spondylitis)
- are obese (especially those with a body mass index of 40 or above)
- have had an organ transplant
- are having chemotherapy or antibody treatment for cancer, including immunotherapy
- are having an intense course of radiotherapy (radical radiotherapy) for lung cancer
- are having targeted cancer treatments that can affect the immune system (such as protein kinase inhibitors or PARP inhibitors)
- have blood or bone marrow cancer (such as leukemia, lymphoma or myeloma)
- have had a bone marrow or stem cell transplant in the past 6 months, or are still taking immunosuppressant medicine

In the case of any emergency warning signs of severe COVID-19 disease, an infected person should immediately seek emergency medical care at the closest hospital or by calling 911 in the United States or 999 in the United Kingdom. Emergency warning signs typically, but not always, include one or more of the following:

- Trouble breathing
- Persistent pain or pressure in the chest
- New confusion
- Inability to wake or stay awake
- Bluish lips or face

Although self-isolation is the first line of defense against viral transmission, it is not enough to isolate only individuals exhibiting symptoms of COVID-19, because an infected person can begin shedding virus into the environment up to 5 days before any symptoms appear, and in some cases an infected person may never experience any symptoms or may have recovered from all symptoms and yet may remain infected and be capable of spreading the virus for a month, and in some cases even up to 70 days, after 'recovering' from symptoms, according to certain scientific estimates. All this means that a person may be contagious even though he or she feels perfectly healthy. In fact, the majority of community-acquired transmissions of SARS-CoV-2 occur from people without any symptoms (asymptomatic or pre-symptomatic people).

Risk Assessment & Mitigation Plan

With the foregoing information in mind, the firm's management team has conducted a risk assessment applicable to its offices in both the United States and the United Kingdom, and has prepared a plan of mitigating actions to address those risks, in each case with a view to re-opening its offices safely. That risk assessment and mitigation plan is set out in the table that follows, and will be re-assessed by firm management regularly as new information becomes available and as the firm takes stock of how its gradual re-opening is progressing, taking into account any lessons learned along this journey toward a "new normal" for the P|C team.

Risks are broken down by scientifically known mechanisms of viral transmission and behaviors required of P|C personnel in performing their job duties. Those risks are then assessed by reference to the likelihood of occurrence and the severity of consequences should risk events materialize, with the resulting score being illustrated in a customary red, amber, green scoring methodology, with red representing a severe risk considering both likelihood and severity, amber being a moderate risk, and green being a low risk. The risks are assigned a red, amber or green severity rating before taking into consideration the mitigation measures put in place under the mitigation plan detailed alongside the risk identification and description. It is the intention of firm management to put in place risk mitigation measures that are as robust as reasonably practicable for a small business, and as such no re-assessment of the risk taking into account the mitigation measures is provided – fundamentally, we are doing everything within our power to minimize risk while preserving our business and re-opening gradually and safely according to government guidance and scientific data.

The controls and mitigation measures set out in the plan below are hereby made immediately effective and must be followed by all P|C personnel. Any non-compliance with this plan should be reported to firm management immediately, and personnel found to be in violation of the plan will be subject to disciplinary action up to and including termination of employment. Please stay safe, be smart, and treat this threat as a serious matter for the health and safety of all P|C team members and their families.

Table of Risks & Mitigating Controls

Risk	Risk Description & Level	Mitigation Plan – Controls Required by this Plan	Additional Comments	Summary Actions
<p>Spread of SARS-CoV-2 through contact in or around the office with personnel or visitors known to be sick</p>	<p>Staff, visitors, contractors, clients and people working for other companies in the buildings where the firm has offices may become sick if they are exposed to the virus on account of any of the firm's personnel or invitees coming to the office while knowingly sick and/or exhibiting symptoms.</p> <p>Given the virulence of this pathogen, in particular the likelihood of a single sneeze or cough causing one or more people to become sick, the risk of transmission in these circumstances is high and the impact of the COVID-19 disease is severe. As a result, this risk carries a high risk rating and consequence severity.</p>	<p>Testing</p> <p>Where possible, P C personnel should be tested for SARS-CoV-2 antibodies to confirm whether they have already been infected by SARS-CoV-2 prior to returning to the office, and those who have not already been infected and recovered should be tested for the virus itself as soon and as frequently as free local testing sites become available and accessible for P C team members. Testing will depend on availability and the policies of the local governments in the places where the firm's offices are located and where personnel live.</p>	<p>Testing</p> <p>Access to government-sponsored or free testing for both active virus and antibodies is limited in both firm locations, with priority given to certain at-risk groups or those showing symptoms (London personnel see https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested and San Diego personnel see https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community_epidemiology/dc/2019-nCoV/testing.html)</p> <p>However, in London Babylon Health has recently made antibody testing available to anyone who is willing to pay the £69 cost of administering the test. The firm will reimburse any London based P C team member who wishes to take the Babylon test, which can be done at home via a kit ordered online at https://www.babylonhealth.com/.</p> <p>In addition, many private health care providers in San Diego are providing tests. Once again, the firm will reimburse the reasonable cost of any antibody test taken prior to returning to the office.</p> <p>P C personnel should specifically be looking for whether they test positive for IgG antibodies, which are the antibodies that demonstrate a person has fully recovered from the virus. Although a positive antibody test does not necessarily mean the person is immune to SARS-CoV-2, there is an emerging view among scientists that the presence of the IgG antibody likely indicates some level of immunity for a duration that is not yet known. The firm will continue to monitor information available on antibody testing and may alter its policies depending on scientific views as to their efficacy and benefit.</p> <p>Although the firm respects the privacy of each P C team member's health information and will not require disclosure of any test results, the firm requests that P C personnel voluntarily share the results of any such test with firm management, as this will help us do a better job in keeping all of our team healthy.</p> <p>If advised that a member of staff or an invitee of the firm has developed COVID-19 and was recently in any of our offices, the firm will contact the relevant public health authorities to report the existence of a case and to help identify potential contacts that should be traced and isolated to prevent further viral transmission. If you become sick or test positive for SARS-CoV-2 you may have legal duties to notify certain authorities and/or people who may have been exposed to the virus through contact with you. Although the firm respects the privacy of all of its personnel and cannot require any</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Get tested for antibodies before returning to the office. The firm will pay the reasonable cost of testing, which can be done at home. <input type="checkbox"/> Those who have not tested positive for IgG antibodies should be tested for active virus infection as frequently as reasonably possible in accordance with local government no-cost testing programs. <input type="checkbox"/> Notify the relevant authorities and persons you may have infected if you become sick with COVID-19. The firm will help if you agree to notify firm management if and when you become infected with SARS-CoV-2.

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			<p>staff member to report any more than they are legally obligated to report, the firm stands ready to help our local and global communities to identify, isolate and contact trace in order to fight the pandemic, and the firm encourages each P C team member to voluntarily disclose to firm management any suspected or known cases of COVID-19 among firm personnel and their immediate families. The firm stands ready to help our personnel make necessary reports and notify potential contacts who have been exposed to an infected team member, and working together we can do our part to fight this virus. If you are willing to make a similar commitment to voluntary disclosure of known or suspected cases in your household and/or if and when you become sick, please sign below to indicate your voluntary commitment to so notify the firm (it being understood that any such commitment may be revoked at any time, subject of course to any legal duties a team member may from time to time have to report and notify people potentially exposed to the virus).</p> <p>.....</p> <p>Name:</p> <p>Date:</p>	
		<p>Staff & Visitors Exhibiting Symptoms</p> <p>Any person exhibiting symptoms of COVID-19 should refrain from attending the office in person. The firm will immediately institute a policy of taking the temperature of each person entering its offices with a no-touch temperature reading device. The firm's management team will contact designated personnel who will be authorized and trained to take temperature readings. Any person exhibiting a higher than normal temperature reading will be asked to leave.</p>	<p>Staff & Visitors Exhibiting Symptoms</p> <p>P C personnel exhibiting symptoms of COVID-19 or who have been diagnosed with the disease are encouraged to promptly report their condition to firm management. The firm may be under legal obligations or may be permitted on a voluntary basis, from time to time, to report any known cases of COVID-19 to governmental authorities. Where required by law, the firm must report known cases. However, P C management believes that identification of known cases, isolation and contact tracing are vital to bringing this pandemic to an end, and therefore requests your support for the voluntary disclosure of known cases involving any P C personnel, both to the relevant authorities and also internally to our other P C team members. The firm will always comply with data protection laws and adhere to the highest standards of confidentiality in dealing with its team members' personal information, including health information, and wherever possible will report known cases through secure platforms and only to other P C personnel and relevant government authorities. If you agree with our approach to voluntary disclosure of known cases, including if you become sick, to the relevant authorities and your colleagues, in each case for the purpose of identification, isolation and contact tracing in order to</p>	<p><input type="checkbox"/> Stay home and seek medical care if you are sick.</p> <p><input type="checkbox"/> Sign up to allow the firm to notify your colleagues if you have become sick. Refusal to consent does not prevent the firm from making any disclosures required by law.</p> <p><input type="checkbox"/> Have your temperature taken before entering the office.</p>

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			<p>reduce viral transmission, please indicate your consent by signing immediately below.</p> <p>.....</p> <p>Name:</p> <p>Date:</p>	
		<p>Paid Time Off & Working from Home</p> <p>All staff members who are able to work from home are encouraged to do so for now. At a point in time to be determined, but likely in July or August, and subject both to available scientific information and government requirements, firm management will request all staff to return to the office; it may do so on a staggered basis between personnel who are in the Clinically High Risk Group and those who are not, all as described in more detail in the final row of this table.</p> <p>Any P C team member who has tested positive for SARS-CoV-2 or who is exhibiting symptoms of COVID-19, or who resides with or has otherwise been exposed to someone who has tested positive for SARS-CoV-2 or who is exhibiting symptoms of COVID-19, should stay home and self-isolate for a minimum of fourteen (14) days, and should report their sickness or potential exposure to the virus to the firm and anyone they have come in contact with during the preceding fourteen (14) day period. Any such person is encouraged to take time off according to relevant firm policies and, if the team member wishes and feels well enough to work remotely, he or she will be permitted to work from home while self-isolating. P C personnel who are working from home are expected to follow the firm's normal policies in relation to remote working, subject to the caveat that there will be no limit on the number of days a team member may work from home for so long as they remain contagious with SARS-CoV-2, and all supervisors are encouraged to be as flexible as reasonably practicable when supervising a remote worker who has tested positive for SARS-CoV-2 or is exhibiting symptoms. The firm will trust P C personnel to use their best judgment and to take sick days off when their symptoms warrant rest or otherwise prevent them from working productively. The firm will take a flexible view in administering its policies related to sick days and paid time off to ensure that no P C team member who is sick and requires rest will in any way be penalized for taking necessary time off to recover from their illness, subject to any prolonged sickness or recovery requiring greater than fourteen (14) days absence</p>	<p>Paid Time Off & Working from Home</p> <p>At times, it will be necessary for personnel to be physically present in the office, and supervisors may request that certain team members come to the office for specific business reasons. At any time before firm management has issued a formal instruction for all staff to return to the office, any person who feels that they have been called to the office in circumstances where there is no justifiable business need or where they feel their in-person attendance is unsafe or contrary to this risk assessment and mitigation plan should immediately report their concerns to the firm's managing partner or chief officer of finance and administration. No P C team member should be requested to attend the office in any circumstance that creates an undue risk of exposure to SARS-CoV-2 or where this risk assessment and mitigation plan otherwise requires or counsels that they refrain from coming to the office. P C personnel found to have attempted to influence any person to attend the office in-person in violation of this risk assessment and mitigation plan will be subject to immediate disciplinary action up to and including termination of employment.</p>	<p><input type="checkbox"/> Self-isolate at home for 14 days if you or anyone in your household tests positive for SARS-CoV-2 or has symptoms of COVID-19.</p> <p><input type="checkbox"/> You must remain productive and continue working according to firm policies when working from home, but supervisors should be flexible wherever possible.</p> <p><input type="checkbox"/> Take time off if you are too sick to work.</p> <p><input type="checkbox"/> If you can, work from home as often as possible until firm management requests all staff to return to the office.</p>

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		from the office and that may, in the sole discretion of firm management, warrant treating the relevant team member as suffering from a long-term disability or illness, in which case the relevant laws and policies in relation to long term disability and illness will apply.		
Spread of SARS-CoV-2 through viral transmission on interior office surfaces	<p>Staff, visitors, contractors, clients and people working for other companies in the buildings where the firm has offices may become sick if they are exposed to the virus by way of fomite transmission when a person touches a surface contaminated with virus particles.</p> <p>Taking into consideration the relatively small number of personnel in each office, and the distance between workstations and physical barriers that separate personnel, but also bearing in mind that common areas remain accessible and the long duration over which the virus remains viable on surfaces, the risk of transmission in these circumstances is moderate and the impact of the COVID-19 disease is severe. As a result, this risk carries a moderate to high risk rating and consequence severity.</p>	<p><u>Hand Washing & Sanitizers</u></p> <p>The firm provides hand washing facilities with soap and water in place. All personnel must observe the firm's stringent hand washing requirements.</p> <p>Personnel should wash their hands for 20 seconds with ample soap, rubbing vigorously over all surfaces, including back of hands, in between fingers and fingertips. Hands should then be rinsed with water flowing downward and fingers pointed down into the basin. Use of disposable paper towels is recommended to dry hands, after which another fresh, disposable paper towel should be used to turn off the tap without touching any surfaces directly.</p> <p>In addition, hand sanitizer will be provided at various accessible points throughout the office. However, all personnel are also required to bring to the office their own gel sanitizer meeting published guidance, and encouraged to bring emollient cream as well. The firm will provide a one-time payment intended to cover the reasonable cost of gel sanitizer and emollient cream for all personnel. Firm management believes it is important to limit personnel visiting common areas and therefore will require individuals to bring their own gel sanitizers rather than relying solely on hand washing stations and sanitizers in common areas of the offices, and the firm encourages each staff member to consider having gel sanitizer on hand at all times out of the office as well.</p>	<p><u>Hand Washing & Sanitizers</u></p> <p>P C personnel must wash their hands at a minimum every time they enter the office premises and before they leave the office, before and after they use the restroom, and before and after they make use of any other common facilities.</p> <p>The alcohol in hand sanitizer works to disrupt the structure of SARS-CoV-2 in a way that effectively deactivates the virus, but it is important the alcohol content of your sanitizer is at least 70% or more. Most sanitizers on the market meet these requirements. Look for ingredients identified as either alcohol or ethanol and ensure that they are at least 70% in concentration.</p>	<p><input type="checkbox"/> Bring in your own gel sanitizer with at least 70% alcohol content.</p> <p><input type="checkbox"/> Wash your hands regularly, and at least every time entering or leaving the office, before and after using the restroom, and before and after using any other common facilities.</p>
		<p><u>Use of Gloves</u></p> <p>Disposable gloves will be made available in the common areas of each office, and staff will be required to use them when receiving packages delivered to the office, when handling documents or other materials that have been handled by others in the office, and when entering the restroom facilities. Gloves should be removed by turning them inside out from the wrist, and then immediately disposed of in the bin designated for PPE disposal. With respect to restroom use, gloves may be removed once the restroom facilities are accessed, but fresh paper towels should be used when turning on and off the tap and when leaving the restroom facilities to avoid having your skin come in direct contact with any restroom surfaces. Employees are welcome and encouraged to bring their own disposable gloves to</p>		<p><input type="checkbox"/> Wear gloves when receiving packages delivered to the office, when handling documents or other materials that have been handled by others in the office, and when entering the restroom facilities.</p> <p><input type="checkbox"/> Dispose of gloves in the bin designated for PPE disposal.</p> <p><input type="checkbox"/> Bring your own disposable gloves if you wish.</p>

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		<p>the office to avoid significant use of common areas and the firm will provide a one-off payment to each staff member during the month that the offices re-open designed to cover the reasonable cost of disposable gloves for use in the office.</p> <p>Cleaning</p> <p>The firm will ensure frequent cleaning and disinfecting of all objects and surfaces that are touched regularly, particularly in areas of high use such as door handles, light switches, telephones, and reception areas using appropriate cleaning products and methods.</p> <p>Cleaners will be trained in the best available cleaning techniques to mitigate the spread of SARS-CoV-2.</p> <p>Cleaners must wear disposable gloves, a disposable mask and a disposable apron at all times, and if cleaning after a known case of COVID-19, must also wear a disposable face shield (collectively, PPE). All such PPE will be provided by the firm.</p> <p>All PPE must be disposed of in a bin designated for such purpose, and discarded PPE must be sealed in a bag and stored for 72 hours on-site before being disposed of.</p>	<p>Cleaning</p> <p>Cleaning protocols published by the United States Centers for Disease Control and Prevention will be made available to and taught to all cleaning personnel and contractors, and are expected to be followed in all cases. The cleaning methods and associated training materials are available at https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html.</p> <p>Experts report that SARS-CoV-2 is an enveloped ribonucleic acid (RNA) virus, meaning that proteins and lipids are part of its structure. Therefore, detergents by themselves – such as soap and ordinary washing-up liquid – work very well at disrupting the virus structure by dissolving the lipids, which in turn inactivates the virus by stopping it binding to human cells. Many products identified as anti-bacterial do not work on SARS-CoV-2; in order to be effective a disinfectant must be an alcohol solution with at least 70% alcohol, or diluted household bleach solutions (hydrogen peroxide or sodium hypochlorite). Certain other anti-viral household disinfectants should be effective, but their effectiveness must be confirmed with firm management and appropriate published government guidance before use. The firm will ensure that cleaning products meeting the above guidance are available in each office and are used by cleaning staff and contractors to fully disinfect objects and surfaces.</p>	<p><input type="checkbox"/> If you are a cleaner you must wear prescribed PPE, and ensure you have had the latest training in cleaning techniques to mitigate the spread of SARS-CoV-2.</p> <p><input type="checkbox"/> If you are a cleaner, clean all surfaces that are regularly touched with the correct cleaning product supplied by the firm.</p> <p><input type="checkbox"/> If you are a cleaner, double check that you have all PPE required if you are cleaning after a known case of COVID 19.</p> <p><input type="checkbox"/> Discard PPE in designated bins and wait 72 hours before permanently disposing materials discarded in the PPE bin.</p>
		<p>Avoiding Shared Use of Equipment & Materials</p> <p>Staff should refrain from using phones, computer monitors and docks, or any other items on another staff member's desk or workspace, regardless of whether the other staff member is present in the office. The firm provides sufficient supplies and equipment that there should never be a need for communal use of any equipment or supplies.</p> <p>Printing should be performed by a single designated staff member on any given day in the office, on the understanding that cleaning occurs on a daily basis to disinfect the copier/printer between days of use. Staff in the office on any given day may elect amongst themselves who is best positioned to perform printing, with the baseline expectation being that the executive assistant or any administrative assistant in the office on any given day is the</p>		<p><input type="checkbox"/> Refrain from using phones, computer monitors and docks, or any other items on another staff member's desk or workspace.</p> <p><input type="checkbox"/> Nominate only one person to use the copier/printer per day, and send all documents for printing or copying to that person.</p> <p><input type="checkbox"/> Bring your own food and water.</p>

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		<p>preferred nominee to manage all printing on behalf of all personnel in the office on that day.</p> <p>For the time being, the firm will discontinue the supply and stocking of water, coffee, snacks and other food and drink items, and the use of kitchen areas to prepare food will be off limits. P C team members are encouraged to bring their own non-perishable food and water to the office and to keep it at their desk. The refrigerator will also be off limits and out of service in both offices until the outbreak is brought under greater control and firm management believes it is safe to resume use of common facilities.</p>		
Spread of SARS-CoV-2 through aerosolized transmission in interior offices	<p>Staff, visitors, contractors, clients and people working for other companies in the buildings where the firm has offices may become sick if they are exposed to the virus on account of any of the firm's personnel or invitees coming to the office while infected but in an asymptomatic or pre-symptomatic state.</p> <p>Given the potential asymptomatic and pre-symptomatic carriers to shed virus particles by breathing or speaking, the risk of transmission is moderate to high in enclosed spaces and the impact of the COVID-19 disease is severe. Therefore, although the firm's offices are well ventilated and relatively sparsely populated as office spaces go, this risk carries a moderate to high risk rating and consequence severity.</p>	<p>In addition to the mitigating controls noted above, all personnel are expected to adhere to strict social distancing guidelines. No team member should come within 2 meters (6½ feet) of any other team member when in the office or office building. In order to achieve this, the following actions have been taken and guidelines should be followed:</p> <ul style="list-style-type: none"> • All workstations have been positioned to ensure sufficient distance between employees when they are seated at their stations • P C team members must take care to observe minimum physical distance of 2 meters (6½ feet) between one another at all times when moving about the office • For the duration that social distancing measures are enforced, personnel in the London office will be assigned to a specific toilet stall and must ensure to use only the assigned facilities when using the restrooms • San Diego personnel must use only their assigned workstations and any team member with an interior office must keep their office door closed at all times • No P C team member should use the kitchen area in any office for any reason other than washing hands; all food-related equipment and dishware is off-limits until further notice • No P C team member should use the meeting room in either office without prior approval of the managing partner or chief officer of finance and administration or, in the case of the San Diego office only, the business manager; meeting rooms will be made available only on an as needed basis and only for one person to use in any given day (exceptions may be granted on a limited basis where compelling client or recruiting considerations necessitate exceptional use and even then only when social distancing 		<ul style="list-style-type: none"> <input type="checkbox"/> Observe social distancing – stay 2 meters / 6½ feet apart. <input type="checkbox"/> If you work in London, use only assigned toilet. <input type="checkbox"/> Keep interior office doors closed if you have an interior office. <input type="checkbox"/> Do not use the kitchen other than for hand-washing. <input type="checkbox"/> Do not use meeting rooms without management approval, which will be given only in exceptional circumstances. <input type="checkbox"/> Bring a mask for face covering to the office and wear it at all times except when inside of your own interior office, if applicable, with the door closed. <input type="checkbox"/> Until firm management requests all personnel back to the office, work from home where possible and when you must be in the office limit your presence to no more than 3 hours if other P C personnel are present.

Risk	Risk Description & Level	Mitigation Plan – Controls Required by this Plan	Additional Comments	Summary Actions
		<p>is adhered to and masks are worn at all times</p> <p>Due to the risk of airborne transmission, all personnel must wear a mask at all times when in the office, except that P C team members with interior offices may remove their masks when they are working alone in their office with the door fully closed. Employees are required to bring their own masks or face coverings to the office to avoid the risk of cross contamination or inadvertent re-use of any contaminated mask, which might occur if the firm supplies identical masks or disposable masks to all personnel. The firm will provide a one-off payment to each staff member during the month that the offices re-open designed to cover the reasonable cost of re-usable face coverings. Masks should be cleaned in a laundry washing machine between use and personnel should procure sufficient masks or face coverings to rotate use and allow time for washing between re-use of any particular mask or face covering.</p> <p>In addition to the above, P C team members are encouraged during the initial phase of re-opening to work from home wherever possible, and when they must be in the office and when any other team member is also present, to limit their time in the office to no more than three (3) hours at a time. Observe the practices in this paragraph until firm management requests all personnel to return (save for those in the Clinically High Risk Group)</p>		
Spread of SARS-CoV-2 through contact with people or surfaces in building common areas outside of the firm's offices	<p>Staff, visitors, contractors and clients attending the firm's offices may become sick if they are exposed to the virus by way of airborne or fomite transmission in building common areas.</p> <p>Taking into consideration the relatively small number of personnel in each office, and the fact that the firm's offices are isolated from other companies' spaces, together with the ability to access the firm's offices through routes other than the main entrance to our buildings, but also bearing in mind that common areas remain accessible and the long duration over which the virus remains viable on surfaces and the high virulence of this pathogen, the risk of transmission in these circumstances is moderate and</p>	<p>Save for exceptional circumstances approved by the firm's managing partner or chief officer of finance and administration, no person other than a P C team member should be admitted to the firm's offices, and all packages delivered to the office should be left outside the door and collected by P C personnel wearing disposable gloves. P C team members must refrain from having any personal packages or parcels delivered to the office.</p> <p>In addition, P C team members must not ride in any lift/elevator in our office buildings at any time when it is occupied by any other person; consider using the stairs instead.</p> <p>To minimize contact with surfaces and other persons in or around the office building, London based personnel should use only the rear building entrance when accessing the office. Similarly, San Diego personnel should access the office from the parking lot wherever possible, in order to avoid the touching the stair railing or other structures along the common exterior walkway.</p>		<ul style="list-style-type: none"> <input type="checkbox"/> Do not let anyone other than P C personnel into the office. <input type="checkbox"/> Wear gloves when collecting packages, all of which should be left outside the office door. <input type="checkbox"/> Do not ride in a lift with any other person. <input type="checkbox"/> Do not have personal items or packages delivered to the office. <input type="checkbox"/> In London, access the office through the rear building door only, and in San Diego access the office from the parking lot and parking lot ramp rather than the exterior stairs. <input type="checkbox"/> Adhere to the published guidance of the building management company.

Risk	Risk Description & Level	Mitigation Plan – Controls Required by this Plan	Additional Comments	Summary Actions
	the impact of the COVID-19 disease is severe. As a result, this risk carries a moderate to high risk rating and consequence severity.	P C personnel must follow published guidance from the building management companies in charge the buildings where our offices are located.		
Spread of SARS-CoV-2 through contact with people or surfaces during commute to or from the firm's offices	<p>Staff, visitors, contractors and clients may become sick if they are exposed to the virus while traveling to the firm's offices via any form of public transportation.</p> <p>Given the virulence of this pathogen, in particular the likelihood of a single sneeze or cough causing one or more people to become sick, the risk of fomite transmission over surfaces that are touched regularly on trains and airplanes, and the density of persons confined to relatively small spaces with recirculated air while in transit, the risk of transmission in these circumstances is high and the impact of the COVID-19 disease is severe. As a result, this risk carries a high risk rating and consequence severity.</p>	<p>P C personnel are encouraged to work from home until otherwise instructed by firm management in accordance with the mitigating controls specified earlier in this risk assessment and mitigation plan, and as noted above staff members must not come to the office at any time that they or any of their household have tested positive for SARS-CoV-2 or feel ill or are experience any coughing or sneezing, or otherwise have any symptoms of COVID-19.</p> <p>Similarly, client meetings should be scheduled virtually over Microsoft Teams wherever possible and no client should be invited to attend any firm office in person without prior consultation with and agreement by the firm's managing partner. Such meetings will be approved only in exceptionally compelling circumstances.</p> <p>Personnel should avoid public transportation wherever possible, and walk, ride a bicycle or take a private car (cab, Uber or similar service) instead. When taking a private car, P C personnel should wear a mask or facial covering during the journey, unless they are driving their own vehicle, and should not share a car or ride together.</p> <p>If public transport is the only option, personnel will be required to discuss this with the firm's managing partner, the chief officer of finance and administration or, for personnel in San Diego only, the firm's business manager, and the relevant firm representative will consider whether it is preferable for the relevant staff member to work from home (for clarity, in no way, shape or form will any staff member's available means of transportation to journey to the office be a basis for any bias against him or her). Where use of public transportation is agreed, 'smart and alert' use of public transportation is paramount:</p> <ul style="list-style-type: none"> • Wear a mask or face covering and disposable gloves • Travel at off-peak times • Take a less busy route and reduce the number of changes • Wait for other passengers to get off before boarding • Keep 2m away from people where possible 	<p>By signing this risk assessment and mitigation plan, P C personnel certify that they will comply with the firm's policies on office attendance and travel to the office, including refraining from attending the office when they are sick and using public transportation only as a last resort and after discussion of alternative options with firm management. Violation of any of these policies is grounds for discipline up to and including termination of employment.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Do not invite clients to the office; rather, conduct virtual meetings. <input type="checkbox"/> Avoid public transportation where possible, and speak to firm management before using public transportation to come to the office. <input type="checkbox"/> Do not share a cab or other car service with another passenger. <input type="checkbox"/> If you must use public transportation: <ul style="list-style-type: none"> • Wear a mask or face covering and disposable gloves • Travel at off-peak times • Take a less busy route and reduce the number of changes • Wait for other passengers to get off before boarding • Keep 2m away from people where possible

Risk	Risk Description & Level	Mitigation Plan – Controls Required by this Plan	Additional Comments	Summary Actions
		<ul style="list-style-type: none"> Wash hands in accordance with the methods specified in this risk assessment and mitigation plan after completing the journey 		
Spread of SARS-CoV-2 through contact with people or surfaces during business travel for client matters or firm administrative and marketing activities	<p>Staff, visitors, contractors and clients may become sick if they are exposed to the virus while traveling nationally and internationally for client matters or firm business. Most P C team members travel internationally with a high degree of frequency during normal operations, and where national travel is required it is almost always over a significant distance requiring the use of trains or airplanes.</p> <p>Given the virulence of this pathogen, in particular the likelihood of a single sneeze or cough causing one or more people to become sick, the risk of fomite transmission over surfaces that are touched regularly on trains and airplanes, and the density of persons confined to relatively small spaces with recirculated air while in transit, the risk of transmission in these circumstances is high and the impact of the COVID-19 disease is severe. As a result, this risk carries a high risk rating and consequence severity.</p>	Client meetings should be scheduled virtually over Microsoft Teams wherever possible. Until such time as firm management determines that the risks in business travel have been substantially mitigated and it is appropriate for all staff to return to normal travel patterns, no P C team member will be required to travel over substantial distances on account of firm administrative or marketing business, and any P C team member invited to attend any events requiring such travel will be invited on a voluntary basis only and may accept or decline participation based upon such team member's assessment of the risks involved.		<input type="checkbox"/> Schedule client meetings virtually. <input type="checkbox"/> Discuss any travel arrangements that make you uncomfortable with firm management.
Development of severe and life-threatening COVID-19 among P C personnel who become infected with SARS-CoV-2.	<p>Any P C team member who becomes infected with SARS-CoV-2 by means of any of the above risk factors or otherwise may develop a severe case of COVID-19 with risks of extremely serious and even fatal symptoms. Fatality and the risk of severe COVID-19 is most prevalent among the Clinically High Risk Group described in the introductory sections of this risk assessment and mitigation plan.</p> <p>Given the severity of potential symptoms and the frequency of death rates among the Clinically</p>	<p>In addition to the mitigating controls described above, the firm encourages any P C staff member who identifies as part of the Clinically High Risk Group to notify firm management. Special measures will be taken to protect P C personnel who are among the Clinically High Risk Group.</p> <p>Specifically, no P C team member who is within the Clinically High Risk Group will be required to attend the office at any time, or required to travel for business on any occasion, in each case when firm management believes, based upon credible, publicly-available scientific information, that a disproportionate risk to such team member's health exists on account of the COVID-19 pandemic. Once such a team member has become inoculated or developed immunity to SARS-CoV-2, or when the pandemic has subsided to levels where the</p>	<p>P C team members that are working from home for protracted periods on account of being a part of the Clinically High Risk Group will be obligated to remain productively engaged while working and must adhere the firm's remote working policies – work from home is still "work", and personnel will be evaluated on their work and expected to maintain levels of productivity consistent with firm policies. The firm reserves the right to terminate the employment of anyone who abuses work from home privileges or who fails to maintain adequate levels of productivity or fails to meet deadlines or to maintain open and regular communication with his or her supervisors.</p> <p>The estimated dates for returning to the office are indicative only and subject to change based on the considered views of firm management as it assesses information that will undoubtedly be published in the</p>	<input type="checkbox"/> Tell the firm if you are part of the Clinically High Risk Group, and work from home for the balance of 2020 if you are able. <input type="checkbox"/> If you are working from home, stay productive and adhere to firm policies on remote working.

Risk	Risk Description & Level	Mitigation Plan – Controls Required by this Plan	Additional Comments	Summary Actions
	High Risk Group, this risk carries a high risk rating and consequence severity.	<p>government authorities with jurisdiction over our offices approve a full return to normal (or “new normal”, as the case may be), there shall be a presumption that it is safe for all personnel to return to the office and to resume business travel.</p> <p>As at the date of this risk assessment and mitigation plan, firm management anticipates that personnel in the Clinically High Risk Group will be permitted to work from home until the end of calendar year 2020, while the rest of the P C team will likely be expected to return to the office at a date in July or August to be announced by firm management in due course.</p>	coming weeks on the successes and failures in re-opening other businesses.	

Actions to be Taken by the Firm

Before re-opening each of its offices, the firm will take each of the following steps in relation to such office:

- ☐ Share this risk assessment and mitigation plan with all staff and host a virtual all-staff team meeting to discuss its contents
- ☐ Post handwashing and hygiene procedures in the office
- ☐ Review cleaning procedures called for in this risk assessment and mitigation plan with relevant cleaners, and stock the office with appropriate cleaning products and hand sanitizers
- ☐ Take all reasonable steps to help staff work from home
- ☐ Take all reasonable steps to ensure social distancing of 2 meters or 6½ feet between personnel
- ☐ Publish on the firm's website the substance of this risk assessment and mitigation plan and our 'Staying COVID-19 Secure in 2020' certificate
- ☐ Plan for the minimum number of people who need to be on site to operate safely and effectively (as described in this risk assessment and mitigation plan)
- ☐ Put in place means of connectivity for remote workers and take reasonable steps to promote all staff wellbeing (including providing funding for and information about antibody testing)
- ☐ Make arrangements to periodically check in on all staff, including remote workers
- ☐ Support workers who are self-isolating in working from home (as described in this risk assessment and mitigation plan)
- ☐ Establish policies for social distancing and access to the office in a manner that minimizes contact with others (as described in this risk assessment and mitigation plan)
- ☐ Provide hand washing facilities and hand sanitizer throughout the office
- ☐ Establish policies to reduce the use of lifts and ensure flow of foot traffic to minimize contact (as described in this risk assessment and mitigation plan)
- ☐ Ensure work stations in use are 2 meters (6 ½ feet) apart or otherwise separated by physical screens or barriers
- ☐ Mark off all common areas other than restroom facilities as 'not in use'
- ☐ Establish policies to limit visitors to the office (as described in this risk assessment and mitigation plan)
- ☐ Conduct a deep cleaning before resumption of office use
- ☐ Establish policies and procedures for safe and effective cleaning of the office every business day (as described in this risk assessment and mitigation plan)
- ☐ Post signs throughout the office reminding personnel of relevant policies and requirements to wash hands and maintain hygiene at all times

- ☐ Provide PPE in the office for cleaners and provide PPE or funding for staff to buy PPE for general personnel use (as described in this risk assessment and mitigation plan)
- ☐ Hold an all staff meeting to train personnel on changes in procedures and policies when the office re-opens and provide periodic additional training

By signing below, you hereby acknowledge that you have received a copy of P|C's risk assessment and mitigation plan, you agree to adhere to all the requirements set out in the risk assessment and mitigation plan, and you confirm that you understand that violations of this risk assessment and mitigation plan are subject to disciplinary action up to and including termination of employment.

Executed as of this day of 2020:

.....

Name:



16 June 2020

COVID-19 Re-Opening Plan Update

for

PEACE | CROWELL
Limited Liability Partnership

This update is supplemental to our 25 May 2020 COVID-19 risk assessment and mitigation plan. Points in this update that contradict the risk assessment and mitigation plan will take precedence and control the firm's position on the relevant matter.

Updates

- The British government's public health authorities have issued various statements calling into question the efficacy and necessity of antibody tests that have earlier been endorsed as effective. In fact, providers such as Babylon Health have actually withdrawn testing in light of these changes. As such, we will suspend portions of the mitigation plan dealing with testing, and simply request all employees to follow relevant government advice in relation to testing. We will continue to evaluate this space and may further revise our position depending on the official reports about availability and reliability of testing.
- The offices have been sanitized and deep cleaned, and we have instituted new COVID-19 compliant cleaning protocols. Signage has also been posted where helpful or required.
- We continue to encourage those who feel effective working from home to do so. Remote work is "work", and it is imperative that we keep on top of tasks for the firm and our clients, but we will not require anyone to regularly attend the office anytime soon. Please be attentive to your supervisors' and our clients' needs, and understand that there may be occasions when it is necessary to attend the office. In those instances, where any employee or staff member has the slightest reservation about safety, either in the office or as a result of public transport or other issues associated with getting to the office, please contact either Jason or Cindy for advice. We will always put the health and safety of our team first.
- All that said, we are pleased to report that both offices will be fully open from July 1st, and subject to those parts of the mitigation plan that are not superseded by this notice, and to the sub-bullets below, any team member who feels a need to resume normal use of the office in order to work effectively may do so from July 1st.
 - We continue to insist that staff members who feel unwell or who register a high temperature must stay home. There will be contactless thermometers available in each office for anybody who forgot to verify their temperature before leaving home.
 - We request that no more than 4 people occupy the London office at any time, and no more than 2 in San Diego at any time. We trust team members to coordinate among themselves to ensure these requirements are met. There is no need to limit the time we spend in the office so long as capacity constraints are observed.
 - Anyone who is not in a closed interior office or who is within 9 feet (3 meters) of any other person should wear a mask at all times while in that proximity to others. Use of masks at all times is encouraged.