
COVID-19 Safety Response Planning for Brookfield Residential Construction Sites

The health and well-being of our team members, trade partners/subcontractors and community is our top priority. This guidance has been prepared to support the safety of all essential individuals accessing our sites while allowing us to continue the vital work of building and maintaining housing for our customers and markets. This guidance is being provided on **April 7, 2020** and is in addition to any federal and/or state/provincial OSHA/OHS requirements and is subject to change. Critical health guidance is being taken from the Centers for Disease Control and Prevention (“CDC”) and Health Canada.

Brookfield Residential’s trade partners and subcontractors are expected to comply with Brookfield Residential’s COVID-19 Safety Response Plan (“Safety Response Plan”). Brookfield Residential’s Site Superintendent will coordinate and manage the Safety Response Plan procedures on each job site. Failure to follow these procedures will result in disciplinary action, up to and including removal from site. **Any concerns or issues related to safety must be raised to the Site Superintendent, without fear of reprisal or retaliation.**

Essential individuals (“Individuals”): Essential individuals have been identified as Brookfield Residential team members, trade partners, and subcontractors. Access to sites will be limited to these Individuals that play a key role in ensuring the continuation of this essential operation. **As such, during these times, it is recommended that visitation by non-essential individuals on site, including customers, be deferred to another time. Exceptions¹ will be evaluated on a case by case basis.**

Site Access:

- All Individuals that are required to access the site, both team members of Brookfield Residential and trade partners/subcontractors, must perform a self-assessment of their personal health using the [CDC’s Self-Checker tool](#) or [Health Canada’s Self-Assessment tool](#) **before** leaving for work in the morning. If any symptoms are noted, the Individual must stay at home and notify their manager/employer and follow CDC or Health Canada guidelines.
- Where possible, sites should be fenced off to limit access to a single point of entry to facilitate sign-in and sign-out procedures.
- In addition to the self-assessment, **prior to** entering the work site, the health of all essential individuals will be assessed in accordance with the Company’s Health Check Questionnaire. Successful completion of the Health Check Questionnaire will dictate access to the site to commence work.

Reports of illness from trade partners should not include names; just numbers and symptoms. Each worker’s privacy is to be maintained by not discussing in a group setting. Reports of illness should be reported to the Site Superintendent by emailing _____.

Once entry to site has been granted, all Individuals must sanitize their hands thoroughly with soap and water or use alcohol-based hand sanitizer.

- **While on site**, if an Individual is not feeling well or begins exhibiting flu like symptoms, they will rest in a designated rest area away from other Individuals so that arrangements can be made for them to leave the site and return home. Refer to the Stay at Home/Return to Work Guidelines for more details.

¹ Exceptions will be considered for customer specific appointments that are required in order for the home to progress. In these situations, all precautions will be taken to protect the health and safety of customers, team members and trade partners/subcontractors. Where possible, technology will be leveraged to support our customers.

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- Alter/Modify site deliveries and corresponding schedules to limit the overall headcount at the jobsite. Delivery personnel should remain in their vehicles at all time if possible, with the Site Superintendent assisting with the coordination of the delivery.
 - When arranging essential inspections from inspectors, consultants, and/or authorities having jurisdiction at our site, indicate to them they will be subject to the same Health Check Questionnaire as others accessing our site and must be cleared before entering.
 - Site Superintendent to update sign-in log regularly throughout the day to know who is on site and to minimize transfer of documents and use of shared stationary. Utilize digital sign-in processes where possible.

Social/Physical Distancing Requirements:

- Individuals working on site must maintain a minimum 6-feet/2-meter distance from others, whenever possible while ensure a task is being performed safely.
- Construction schedules for trade partners and/or subcontractors must be staggered/alterd to support social distancing protocols, including maintaining a minimum of 6-feet/2-meter distance during work being performed. It is recommended that only one trade partner/subcontractor work on the interior of a home, while another trade partner/subcontractor works on the exterior of the home. As such, no more than two trade partners/subcontractors are allowed to work on a home at the same time. Ideally, only one trade partner should work on a home at a time.
- It is recommended that a product under construction be cleared of all Individuals during an inspection to support social distancing protocols.
- Where lines or groups of people may form on site, establish markers to mark 6-feet/2-meter increments to identify where Individuals should stand to maintain social distancing protocols.
- Site teams should stagger break and lunch schedules to minimize the number of people near one another (no more than 10 Individuals at one time). During this time, Individuals must keep approx. 6-feet/2-meter away from others. Establish multiple break areas or encourage Individuals to take their breaks (alone) in their personal vehicles.
- When greeting others, politely decline handshaking and use alternative non-physical communication methods.
- Only one driver per vehicle and sanitize between drivers. If practicable, try to use the same vehicle every shift.
- Minimize ride-sharing where possible. While in vehicles, workers must ensure adequate ventilation.

Site Awareness Materials:

- Post signs and bulletins throughout the site to follow guidelines as prescribed by local regulatory agencies (as required), as well as the CDC or Health Canada over hygiene and social distancing protocols. Signage throughout the site will include: avoid entering if you have a cough or fever; maintain a minimum 6-foot/2-meter distance from one another; sneeze and cough into a cloth or tissue or, if not available, into one's elbow. Where required, post information in multiple languages.
- Post signs at all site entrances that provide guidance to check-in to the site by texting Site Superintendent at _____ and direct trades to the location to the common check point.
- Where possible, post proper hand washing technique materials near/next to each hand washing station.

Site Meetings:

- In general, Individuals should utilize technologies available to them such as email, text and teleconferencing to minimize direct contact with others.
- Any large site offices should be limited to a maximum of five people and small site offices should be limited to a maximum of three people. Prior to entry, please knock. You must receive verbal confirmation and approval to enter prior to stepping inside. Social distancing protocols are required inside offices at all times. Further, site sanitation procedures must be followed to disinfect shared surfaces and high touch areas in the site office after every meeting.
- Where work trailers are used, only necessary employees should enter the trailers and all employees should maintain social distancing while inside the trailers.
- Where possible, site meetings (ex: site orientations, toolbox meetings, etc.) should be done verbally outside the Field Office, while maintaining social distancing requirements, or through the use of technology (phone, videoconferencing, etc.) to minimize the number of physical attendees. No signatures or transfer of documents. Site Superintendent signs on their behalf.
- For situations where in-person meetings are absolutely required, these meetings must be held outside and have no more than 10 people in attendance. Social distancing protocols must be followed.
- All non-essential events must be canceled or postponed (e.g. site barbeques).
- In order to minimize physical documents associated with site meetings, Site Superintendent will take responsibility to take notes and when possible, use technology, such as email, to share documents and transfer information.

Site Work Environment:

- Hazard assessments must be conducted to identify safety risks, including exposure points of transmission such as shared tools, high touch locations and social distancing limitations.
- Shipments and deliveries should be dropped off and personal contact should be minimized. Where signatures are required, each signer should use their own pen. If not feasible, pens should be disinfected after each use.
- Site Superintendent will conduct regular site inspections on a daily schedule to ensure the COVID-19 Safety response plan is adhered to, including monitoring social distancing requirements and identifying opportunities for improvement.

Site Sanitation and Personal Protective Equipment (“PPE”):

- Frequent reminders to all Individuals on site to regularly and thoroughly wash hands with soap and water or use alcohol-based hand sanitizers (must contain a minimum of 60% alcohol content). Additional reminders include: avoid touching your eyes, nose, and mouth with unwashed hands.
- Install additional hand sanitizer stations throughout the site and where possible, construct temporary sinks / hand wash areas with soap, paper towels and if possible, no-touch waste receptacles. Locations should be in easily accessible, high-traffic locations (consider using garages as a convenient location).
- In addition to the hand sanitizer stations located on site, each trade partner and/or subcontractor is responsible for providing hand sanitizer for their respective Individuals.
- Each trade partner and/or subcontractor remains responsible to provide PPE for their respective Individuals, noting that **glove use and eye protection is mandatory and must be worn at all times**. Types of gloves should vary based on tasks performed and must adhere to PPE safety requirements.

When gloves are not a required PPE component to the task, alternative gloves must be worn. Alternative glove options include latex, vinyl, or nitrile.

- Respirators:
 - N95 respirators should only be used when required for specified work, and where possible, an evaluation of alternative respirators should be completed before work commences to determine what type of respirator/PPE is required in relation to the associated work hazard.
 - Due to shortages with N95 respirators, extended use or reuse may become necessary. Each trade partner and/or subcontractor is responsible for addressing within their respective policies/programs what circumstances a disposable respirator will be considered contaminated or no longer suitable for extended use or reuse.
 - To minimize use of N95 respirators, use engineering and work practice controls to minimize dust (ex: dust suppression systems or open air areas). Consider the use of water delivery and dust collection systems, as well as limiting exposure time. Where possible, perform these functions away from other Individuals to minimize impact.
- Under the guidance of the CDC, [cloth coverings](#) are recommended when in public and should be used at our job sites when the use of respirators in general are not required as part of work to be performed.
- Use only your own tools. Limit the sharing of tools and equipment where possible. If sharing of tools and equipment is unavoidable, each trade and subcontractor is responsible for sanitizing tools and equipment between each use.
 - Each trade partner and/or subcontractor should have their own First Aid kits.
- All Individuals are to bring their own water jugs or bottled water. Halt use of communal drinking water coolers for the time being. The sharing of food or personal items should be avoided.
- Disinfect and sanitize common areas/shared spaces, such as washrooms doorknobs/handles, tablets/iPads, phones, etc. often. Refer to Field Cleaning Checklist for specific protocols.
- Where possible, no-touch waste receptacles will be used and ensure that waste receptacles are emptied frequently using appropriate PPE when conducting disposal activities.

Customer Care/Warranty Services:

- Only emergency/essential warranty service work and customer care activity on the interior of homes will be conducted. All other non-emergency work will be deferred. Site Superintendent to coordinate and review requests for customer care/warranty services with Brookfield Residential's Customer Care/Warranty team.