

COVID-19 Preparedness, Response and Control Plan



Overview

Pactiv is a key component of the food supply chain and a critical infrastructure business operating in the U.S., Canada and Mexico. As such, Pactiv continues to operate all of its manufacturing facilities and warehouses during the COVID-19 pandemic. In doing so, Pactiv continues to employ thousands of people, supply thousands of customers and provide products that millions of people depend on in purchasing, serving and consuming food on a daily basis.

As we continue to operate as a Critical Infrastructure employer, Pactiv is committed to providing a safe and healthy workplace for all our associates and others visiting or working at our facilities. To ensure a safe and healthy workplace, we are following appropriate guidance from the US Centers for Disease Control (CDC), including the CDC's *COVID-19 Critical Infrastructure Sector Response Planning* Guidance. As recommended by this CDC guidance, we have developed this COVID-19 Preparedness, Response and Control Plan ("COVID-19 Plan", or "Plan").

The goal of this Plan is to prevent or slow the spread of COVID-19 in our workplace. As recommended by the CDC's COVID-19 Critical Infrastructure Guidance, our Plan addresses the following areas:

- Preventing and reducing transmission among employees and visitors to our facilities;
- Maintaining healthy business operations; and
- Maintaining a healthy work environment.

As recommended by the CDC, our COVID-19 Plan also considers relevant guidance in CDC's *Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19)*, dated May 2020, which recommends that our Plan includes:

- Identification of all areas and job tasks with potential exposures to COVID-19; and
- Control measures to eliminate or reduce such exposures

The CDC recommends that a COVID-19 Plan also reflect applicable Occupational Safety and Health Administration (OSHA) requirements for protecting critical infrastructure workers. CDC and OSHA have issued *Interim Guidance for Manufacturing Workers and Employers*, which is reflected as appropriate in our Plan.

Associate involvement is essential in developing and maintaining a successful COVID-19 Plan. We have involved our associates in this process by providing them with regular communication, training and daily job tasks that support our COVID-19 prevention initiatives.

I. COVID-19 Assessment and Control Plan

Consistent with CDC and OSHA's *Interim Guidance for Manufacturing Workers and Employers*, Pactiv has assigned responsibility for overall COVID-19 assessment and control planning to its Director of Environmental, Health and Safety (Dir, EHS). Pactiv facility managers and Human Resources (HR) representatives assist with these assessment and planning efforts, and are aware that the Dir, EHS may be contacted with any COVID-19 concerns. These leaders regularly communicate with associates to answer questions and ensure understanding of practices and policies associated with our COVID-19 response. Facility employees can raise concerns through their facility leaders, or directly with the Dir, EHS.

The Dir, EHS, in conjunction with its Safety Managers and Pactiv Legal, are responsible for ensuring Pactiv maintains up-to-date information concerning COVID-19. This same group is also responsible for any required coordination with state and/or local public health officials or other governmental agencies.

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OSHA has provided guidance with respect to “Classifying Risk of Worker Exposure to SARS-CoV-2”, which includes four risk exposure levels: very high, high, medium, and lower risk. As Pactiv operations do not involve contact with people known to be, or suspected of being, infected with SARS-CoV-2, and involve minimal occupational contact with the public, the risk of Pactiv employee exposure to COVID-19 is considered lower risk.

Although the potential COVID-19 risk to Pactiv employees is considered low, Pactiv has conducted assessments to identify potential COVID-19 risks and prevention strategies, which are periodically updated. A summary of the key potential COVID-19 risks and associated prevention strategies is provided below. For simplicity, the table below refers only to employees. Pactiv recognizes this same risk also applies to visitors and contractors at our facilities, and therefore is employing the prevention strategies for these individuals, as well.

GENERAL PACTIV COVID-19 RISKS AND PREVENTION STRATEGIES

Potential Risk	Prevention Strategy(ies)	Relevant Document Section	Comments
Associates enter the facility while sick	<ul style="list-style-type: none"> Entry Screening Leave Policies Face Covering Requirement Routine Cleaning, Sanitation and Disinfection Handwashing 	<ul style="list-style-type: none"> Plan for Preventing and Reducing Transmission of COVID-19 Maintaining Healthy Business Operations Maintaining a Healthy Work Environment 	Training employees on the importance of not coming to work when sick.
Associates contact frequently touched surfaces while at work	<ul style="list-style-type: none"> Routine Cleaning, Sanitation, and Disinfection 	<ul style="list-style-type: none"> Maintaining a Healthy Work Environment: Housekeeping, including Routine Cleaning 	Training employees on the importance of frequent cleaning and disinfection
Associates casually interact with each other while at work	<ul style="list-style-type: none"> Social Distancing Handwashing Leadership Audits and Observations 	<ul style="list-style-type: none"> Maintaining Healthy Business Operations: Social Distancing, Handwashing 	
Associates occupy enclosed spaces together	<ul style="list-style-type: none"> Max Office Occupancy Social Distancing Handwashing Leadership Audits and Observations 	<ul style="list-style-type: none"> Maintaining Healthy Business Operations: Social Distancing, Handwashing 	
Associates must work within 6 feet of each other for a required task	<ul style="list-style-type: none"> Plexi-glass Barrier or Face Shield Face Covering Requirement Handwashing 	<ul style="list-style-type: none"> Plan for Preventing and Reducing Transmission of COVID-19: Face Coverings 	Plexi-glass or similar barrier is Engineering Control
Associates have COVID-19 but are at work since asymptomatic and undiagnosed	<ul style="list-style-type: none"> Face Covering Requirements Handwashing Social Distancing 	<ul style="list-style-type: none"> Maintaining Healthy Business Operations: Social Distancing, Handwashing Plan for Preventing and Reducing Transmission of COVID-19: Face Coverings 	
Visitors and contractors could pose COVID-19 risks to employees	<ul style="list-style-type: none"> Prohibit non-essential visitors and contractors from entering our facilities Entry Screening Face Coverings 	<ul style="list-style-type: none"> Plan for Preventing and Reducing Transmission of COVID-19: Screening for Associates Exhibiting Signs & Symptoms of COVID-19 Maintaining a Healthy Work Environment: Other Precautions 	

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II. Plan for Preventing and Reducing Transmission of COVID-19

Screening for Associates Exhibiting Signs & Symptoms of COVID-19

Associates have been informed of and encouraged to self-monitor for signs and symptoms of COVID-19. The following policies and procedures have been implemented to assess workers' health status prior to entering the workplace and for workers to report when they are sick or experiencing symptoms:

- All associates, contractors, and visitors must undergo a pre-shift COVID-19 screening, consisting of a series of questions, prior to entry.
- In addition to the screening questionnaire, all associates, contractors, and visitors must also undergo temperature screening prior to entry.
- Any associate, contractor, or visitor exhibiting signs or symptoms of COVID-19, as identified through the screening, will be directed to return home and contact HR for further instruction.
- Associates are also instructed that should they begin to experience any COVID-19 symptoms while at home, they should not report for work and should instead contact HR for further instruction.
- In addition, associates are instructed that should they experience symptoms of COVID-19 while at work, they should immediately contact the manager or supervisor on duty to report the symptoms. The manager or supervisor will immediately isolate the associate and send him/her home and the associate will be instructed to contact HR for further instruction.
- HR will then direct any associate exhibiting or claiming to be exhibiting signs or symptoms of COVID-19 to our Occupational Health Services Nurse Staff for evaluation.

Response Plan for a COVID-19 Positive Test

When a Pactiv facility has one or more associates who test positive for COVID-19, additional risks can be present. Pactiv's key COVID-19 response and prevention strategies when associate(s) test positive for COVID-19 are provided below:

- Per CDC guidelines, if it is within 7 days of the associate's last day worked, the areas that the associate worked or visited are cleaned with CDC-approved cleaning chemicals;
- The positive associate is not permitted to return to work without a Return to Work (RTW) note provided by a Health Care Provider (HCP).
- The potential close contacts of the positive associate are contacted to determine if they are Confirmed Close Contacts. Confirmed Close Contact procedures are discussed in detail below in Section III. Maintaining Healthy Business Operations **Policies for Associates Exhibiting Signs and Symptoms of COVID-19**

When and if appropriate, as part of its post-positive response, Pactiv also considers improvements to the facility's ventilation system, such as further opening minimum outdoor air dampers for enclosed spaces to reduce or eliminate recirculation.

Face Coverings

CDC recommends wearing cloth face coverings as a protective measure in addition to social distancing (i.e., staying at least 6 feet away from others). Cloth face coverings may be especially important when social distancing is not possible or feasible based on working conditions. A cloth face covering may reduce the amount of large respiratory droplets that a person spreads when talking, sneezing, or coughing and may prevent people who do not know they

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have the virus that causes COVID-19 from spreading it to others. Cloth face coverings are intended to protect other people—not the wearer.

Pactiv requires face coverings be worn by all associates at its locations where required by state or local requirements. Pactiv has also elected to require that face coverings be worn in all of its manufacturing and warehouse facilities. Consistent with recommendations in the CDC and OSHA’s *Interim Guidance for Manufacturing Workers and Employers*, Pactiv ensures that face coverings:

- Fit over the nose and mouth and fit snugly but comfortably against the side of the face;
- Are secured with ear loops or to head protection;
- Include multiple layers of fabric;
- Allow for breathing without restriction;
- Can be laundered using the warmest appropriate water setting and machine dried daily after the shift, without damage or change to shape (a clean face covering should be used each day);
 - Note – surgical masks, if worn as a face covering, are not laundered
- Are not used if they become wet or contaminated;
- Are replaced with clean face coverings, provided to employees, as needed.
- Are handled as little as possible to prevent transferring infectious materials to or from the face covering; and
- Are not worn with or instead of respiratory protection when respirators are needed.

Where two or more associates are required to perform a task within 6 feet of one another, Pactiv requires that a face shield be worn in addition to the face covering, unless a Plexi-glass barrier or similar is in place. All associates must wash their hands before and after performing these tasks.

Face coverings will not be required when:

- Eating or drinking (social distancing must still be maintained);
- Alone in an office;
- Working outside (provided social distancing is maintained);
- Taking a break alone in one’s personal vehicle;
- Wearing a face covering will create an unsafe condition in which to operate equipment or execute a task (location manager pre-approval is required);
- Wearing a face covering impedes one’s vision for a particular task (location manager pre-approval is required)
- An individual has a medical condition that prevents him/her from wearing a mask/face covering (documentation, from a healthcare provider, to HR is required).

Associate Communications and Training

The various components of this COVID-19 Plan have been regularly communicated to all associates via electronic, paper and oral communications to all associates since the start of the COVID-19 crisis and necessary training has been provided. All associates have also been provided COVID-19 Educational Series training by the organization covering topics, including 1) the Basics of COVID-19, 2) Pactiv Preventative Measures, 3) Actions Taken Following a Positive Case, 4) Protecting Yourself and Others and 5) Safeguarding Yourself Outside the Workplace.

As Pactiv requires a face covering, all associates have been provided communication and training regarding how to effectively and safely wear a mask or face covering. Associates are also provided required updates regarding changes

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to federal, state or local regulations affecting rules during the COVID-19 crisis. Communication and training is provided in languages other than English as deemed necessary.

Additional communication and training will be ongoing as both a reminder and as additional needs arise.

III. Maintaining Healthy Business Operations

Policies for Associates Exhibiting Signs & Symptoms of COVID-19

Pactiv has implemented leave policies that promote employees staying at home when they are sick, when household members are sick, or when required by a health care provider to isolate or quarantine themselves or a member of their household. Eligible Pactiv employees may be eligible for pay and leave benefits, for up to 14 calendar days. If affected employees need to be off work beyond 14 calendar days, FMLA benefits, consistent with their leave type, would apply. Further, we will consider accommodations for workers with underlying medical conditions or who have household members with underlying health conditions. Pactiv will engage in the interactive process with any associate with restrictions related to COVID-19 to determine, what, if any, accommodation can be made. In addition, all Pactiv employees and their eligible household members may utilize the Employee Assistance Program for access to counselors and services that may be needed during the COVID-19 pandemic.

Pactiv has also implemented a process for informing associates if they have been a close contact of a person with COVID-19 at their workplace and requiring them to quarantine for the required amount of time. Leadership identifies and determines close contacts by speaking with the associate who is positive for COVID-19, speaking with the potential close contacts and checking supporting items, like a staffing chart or video within the facility. Confirmed close contacts are not permitted to return to work until they complete an evaluation with the Occupational Health Services Nurse Staff and are released to return to work, in accordance with Pactiv policy, CDC guidance and state regulations.

In addition, in addressing positive test results and identifying close contacts, Pactiv safeguards the identity of any employee who has been confirmed positive and does not reveal the employee's identity to potential or confirmed close contacts.

Social Distancing

Social distancing is being implemented in the workplace through the following engineering and administrative controls: signage and markings are placed throughout the facility indicating 6 foot distances and work stations are set up to ensure social distancing of at least six feet. In work areas where six-foot distances are challenging, additional layers of protection, like plexi glass barriers or face shields are required. Associates are restricted from sharing office spaces for greater than 2 hours, per week, even if they are able to maintain 6 foot distances. In addition, social distancing is required in the break rooms, bathrooms and locker rooms at all times and signage and instruction is provided to associates to ensure compliance.

Associates and visitors are prohibited from gathering in large groups. Associates and visitors are likewise prohibited from gathering in confined areas, including elevators, and from using other associates' personal protective equipment. Maximum occupancy signs are posted in commonly used enclosed spaces to limit occupancy.

Leaders monitor compliance with Social Distancing guidance by completing routine audits and observations.

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Business Continuity

Pactiv has implemented its Business Continuity Plan (BCP) during the COVID-19 Pandemic. Pactiv has established a proven BCP process that has been in place for many years. This process has been utilized numerous times in the past due to severe weather events or other interruptions to our business or supply. These collective experiences are being used to plan for and mitigate potential business impacts from the COVID-19 crisis.

Key components of Pactiv's COVID-19 BCP implementation include:

- Frequent interactions with suppliers of direct and indirect materials;
- Sourcing direct or indirect materials from secondary or tertiary suppliers when a primary supplier is not available due to COVID-19 concerns;
- Producing products at alternative Pactiv locations as necessary; and
- Regular updates to customers on our response to the COVID-19 crisis.

IV. Maintaining a Healthy Work Environment

Housekeeping, including Routine Cleaning

Regular housekeeping practices have been implemented, including routine cleaning and disinfecting of work surfaces, equipment, tools and machinery, time clocks, motorized vehicles and equipment and areas in the work environment, including restrooms, break rooms, lunch rooms, meeting rooms, and entrances.

Further, frequent cleaning and disinfecting is conducted in high-touch areas, such as phones, keyboards, touch screens, controls, door handles, elevator panels, railings, copy machines, time clocks, motorized vehicles and equipment, etc.

Associates are urged to avoid using other associates' phones, computer equipment, desks, cubicles, workstations, offices or other personal work tools and equipment, whenever possible. However, when the sharing of such equipment cannot be avoided, effective cleaning and sanitation of the equipment must be completed by the user prior to use.

In addition, if an individual becomes positive for COVID-19, we ensure compliance with CDC guidance in cleaning and disinfecting affected areas using CDC approved cleaning and disinfecting supplies.

Respiratory Etiquette: Covering Your Cough or Sneeze

Associates and visitors are instructed to cover their mouth and nose with their sleeve or a tissue when coughing or sneezing and to avoid touching their face, in particular their mouth, nose and eyes, with their hands. They should dispose of tissues in the trash and wash or sanitize their hands immediately afterward. Respiratory etiquette is demonstrated on posters and supported by making tissues and trash receptacles available to all associates and visitors. Proper respiratory etiquette is communicated to associates regularly via communication postings, handouts and electronic monitor communications. In addition, leadership team members regularly remind employees of appropriate respiratory etiquette and audit/observe associates to ensure correct behaviors.

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Handwashing

Basic infection prevention measures have been implemented at our locations at all times. Associates are instructed to wash their hands for at least 20 seconds with soap and water frequently throughout the day, but especially at the beginning and end of their shift, prior to any meal times and after using the toilet. All visitors to the facility are required to wash their hands prior to or immediately upon entering the facility. Hand soap and hand sanitizer (of greater than 60% alcohol) is readily made available in our facilities for all associates, contractors and visitors. Facilities regularly monitor supplies of hand soap and hand sanitizer to ensure sufficient supplies are maintained. Signage is posted throughout the facility and communications and training are provided to associates, contractors and visitors to ensure all individuals are regularly washing and/or sanitizing their hands.

Other Precautions

Other precautions taken by Pactiv to maintain a healthy work environment during the COVID-19 Pandemic include:

- Implementing a work at home policy for employees whose functions enable them to perform their roles successfully offsite.
- Prohibiting all non-essential visitors and contractors from entering our facilities;
- Minimizing non-essential travel;
- Promoting use of videoconferencing or teleconferencing when possible for work-related meetings and gatherings;
- Canceling, adjusting, or postponing large work-related meetings or gatherings that can only occur in-person; and
- When videoconferencing or teleconferencing is not possible, hold meetings in open, well-ventilated spaces continuing to maintain a distance of 6 feet apart and wear cloth face coverings.