



13th March 2020

BUSINESS CONTINUITY PLAN – COVID-19

Overview

This Business Continuity Plan (BCP) Overview summarizes our response to the Coronavirus (COVID-19) and outlines actions taken by northAmerican® to protect our stakeholders, including employees, suppliers, transferring employees of our clients (assignees), client contacts, and agents.

Our executive leadership will continue to address the situation and implement appropriate protocol and have established an oversight committee. This document may be shared with all stakeholders.

General Directives

To ensure that we address the risks associated with COVID-19 the following minimum measures will be undertaken:

- We are keeping in communication with all stakeholders (employees, suppliers, clients etc.). We have set up SharePoint sites to communicate with our employees. We have established email accounts dedicated to receiving COVID-19 specific communications. We will publish updates to stakeholders periodically as new policies or practices warrant.
- We are monitoring government and industry updates, including disease progression, country and WHO responses, supplier and supply chain risks, and prevention and containment measures.
- Communicated health expert recommended best practice personal hygiene and health practices.
- We have implemented employee travel restrictions and are restricting anyone having traveled to or through any restricted countries from entry into any Company facility for 14 days.
- We already have in place systems for remote video meetings and will require their use for ongoing interactions between our offices, and for most customer and business partner meetings unless personal interaction is business essential.
- Employees feeling ill with symptoms of the COVID-19 virus have been directed to stay at home and seek medical attention. northAmerican has developed protocols to manage office closures, notify affected persons, and require self-quarantine for known contacts with confirmed COVID-19 cases.
- In addition to current work from home capabilities we have multiple locations geographically distanced and interconnected with global systems so that in the event a pandemic became critical in any one location, we have capability to shift certain activities in many cases to alternate sites.
- We have an executive level task force to monitor and guide policy and practice decisions for the company.

- Our compliance hotline is available for use by anyone with a COVID-19 compliance concern.

northAmerican Office Employees

To continue providing our services to our stakeholders, northAmerican has business continuity plans across its domestic and international operations that allows office personnel to work from home in the event offices are unavailable for any reason. Employees either have laptops or software that allows them to securely access our business applications via their home computers.

northAmerican provides links to CDC resources on Coronavirus/COVID-19 prevention and treatment:

<https://www.cdc.gov/coronavirus/2019-ncov/about/prevention-treatment.html>

In-Person Service Delivery

northAmerican employees, agent personnel, and suppliers that interact directly with client personnel such as in their homes or vehicles have received guidance regarding safety measures, beyond the CDC prevention and treatment guidance above:

- Avoid physical contact and this expectation is communicated in advance of meeting assignees as we are “Trying to keep everyone safe from the Coronavirus.”
- We have and will continue to provide guidance to employees, agencies, contractors and all supply chain service providers regarding direct interaction with customers.
- Respect the client’s decision if they deny entry to their home/premises or refuse to engage.
- Clean cars used to tour with transferees using proper disinfectants daily or more often.

Travel

northAmerican has limited business travel by requiring executive management approval.

Employees that have travelled to higher-risk (CDC Level 3) countries on business or vacation have been directed to work from home for at least 14 days prior to returning to the office and follow CDC guidance.*

*The CDC provides a list of these countries and steps for travelers to take:

<https://www.cdc.gov/coronavirus/2019-ncov/travelers/after-travel-precautions.html>