Universal Face Mask Policy

Introduction

With cold and flu season upon us and a record increase in confirmed COVID-19 cases in our county and surrounding counties, the risk of exposure to an infected person continues to increase.

New York State regulations require any employee who is present in the workplace to be provided with and required to wear a face covering when unable to maintain social distance of at least 6 feet from others.

New York regulations also stipulate any individual who is over age two and able to medically tolerate a face covering shall be required to cover their nose and mouth with a mask or cloth face covering when in a public place and unable to maintain, or when not maintaining, social distance. Business owners may deny admittance to individuals who fail to comply with the directive to wear a face covering.

Considering this, Company will continue to respond to the COVID-19 pandemic in a manner that promotes the health and safety of employees, customers, contractors and visitors. Company’s policies and procedures are aligned with the most recent guidance from government agencies, public health officials and the Centers for Disease Control and Prevention (CDC).

Policy

Going forward all employees, customers, contractors and visitors are required to wear an approved face covering while on Company’s premises. An individual must wear an approved face covering from the moment they enter either of our facilities.

Requirements

Face masks are required to be worn by all persons on Company premises, specific examples include but are not limited to;

1. When entering the lobby, communal bathrooms and hallways.
2. When storing items or collecting items in locker rooms.
3. When standing at the time clocks waiting to punch in or out.
4. When preparing or gathering food for breaks or lunches; and
5. When outdoors in the presence of others if physical distancing is difficult to maintain (picnic tables, benches, smoking areas etc.).
6. When talking to another person regardless of how far apart you are.
Exceptions

There are certain situations where a face mask may be moved below the nose and mouth to ease breathing, they are as follows:

1. When alone in a private office or work area and physical distancing from others can be maintained.
2. When working behind plexiglass barriers and physical distancing from others can be maintained.
3. When actively engaged in eating and/or drinking and appropriately distanced from others in an indoor or outdoor space.

Acceptable Face Coverings

Recent data suggests that the effectiveness of gaiters and bandanas are questionable and potentially ineffective. Due to the uncertainty Company will continue to take a conservative approach to protect our employee’s health and safety to the largest degree possible and will not allow gaiters and bandanas in our workplace.

Consistent with CDC guidance, Company does not consider face shields to be an adequate substitute for face masks due to the possibility that droplets could travel under or to the side of the shield if the wearer coughs or sneezes. As such, a face shield may only be utilized when used in conjunction with a face mask.

As a reminder, the best way to prevent COVID-19 is to continue social distancing (staying at least 6 feet away from others), even when wearing a face covering.

Non-Compliance

If an employee declines to wear a face mask as required, the supervisor or respective member of management is responsible for addressing it with the employee. Employees should refrain from addressing non-compliance or perceived non-compliance directly with other employees and should instead report issues to their supervisors or a member of the Human Resources Department.

If an employee declines to wear an approved face mask or refuses to wear it as required, they will be immediately sent home and will be subject to the attendance policy outlined in the Collective Bargaining Agreement and Company’s progressive disciplinary process. Guidance for mask accountability begins on page 3 of this document.

Members of the public who are not abiding by face mask requirements will first be offered a disposable face mask, if possible. If they refuse to comply with face mask requirements, they will be asked to leave and given options of how they can be served virtually.

Masks are a supplement to—not a substitute for—other preventive measures. They are intended as an added layer of protection on top of social distancing and other common-sense protections, like frequent handwashing, use of hand sanitizer, working and conducting other activities remotely, and staying home when sick or experiencing common symptoms of coronavirus.
Framework for Adherence and Accountability

- **Individuals** are asked to take personal accountability to keep themselves, their colleagues and our community healthy and safe by complying with Company’s Universal Mask Policy.

- **Supervisors & Managers** should set clear expectations of accountably by creating consistent messaging, practices and addressing non-compliance.

- **Company Messaging** and signage will set the tone throughout our facilities reminding employees and visitors to the importance of following these safety practices.

- **Company Policy** will set clear and consistent policies and procedures for the health and safety of our employees and our community.