

# COVID-19 Response Planning Preparedness Considerations

Comprehensive Decision-Making Tool Kit



# Letter to Our Readers

The content of this Tool Kit has been designed and prepared as a resource for clients and industry peers to have information and insight on risk exposures and human capital concerns emanating from an infectious disease event or outbreak. Given the COVID-19 pandemic event which is currently unfolding, this Tool Kit can be even more important. Strategies like the ones provided in this Tool Kit may be considered while an organization begins planning its own policies and protocols to prepare and safeguard its employees and business.

Infectious disease, by its very epidemiology, is an evolving topic. As such statements made in this Tool Kit are situational to the current level and impact of the outbreak in a particular region. Aon is not responsible for the accuracy of the information nor an organization's use of or reliance on Aon's statements.

The statements provided herein are in no event a legal opinion. Aon recommends an organization consults with its legal advisor before taking any action based upon Aon's statements contained herein.

If you would like assistance to develop your internal policy and protocols, Aon's Business Continuity Management practice can support you with one-to-one meetings under a mutually-agreed consulting contract.

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# COVID-19: An Introduction

Aon's Global Infectious Disease Response Task Force supports organizations in mounting effective infectious disease response, and in planning for impacts that may confront businesses, their employees, and the communities in which businesses operate and employees reside.

This resource guidance is designed to present practical solutions that are actionable, timely and relevant to client needs.

## What Exactly Is COVID-19?

The Center for Disease Control (CDC) endeavors to help prevent exposures to acute respiratory illnesses, including the coronaviruses that cause COVID-19. Coronaviruses are a family of viruses that circulate in bats, who infect other animals, who in turn transmit the virus to humans. The novel coronavirus virus, known as SARS-CoV-2, causes COVID-19, a respiratory illness that was first identified in Wuhan, China, and is now spreading from person-to-person throughout much of the world.

According to the CDC, in adults, symptoms\* of COVID-19 can appear 2 – 14 days after exposure, and include:

- Fever (100.4° F [37.8° C] or greater using an oral thermometer)
- Cough

Some signs that the disease has become severe include:

- Difficulty breathing or shortness of breath
- Persistent pain or pressure in the chest
- New confusion or inability to arouse
- Bluish lips or face

*\*This list is not all inclusive. Please consult your medical provider for any other symptoms that are severe or concerning.*

On March 11, 2020 the World Health Organization declared COVID-19 a global pandemic, pointing to the over 118,000 cases of the coronavirus illness in over 110 countries and territories around the world and the sustained risk of further global spread. A pandemic is declared when a new pathogen is able to infect people easily and spread from person to person in an efficient and sustained way.

## What Should My Organization Be Doing?

Infectious disease has the potential of creating a severe impact to organizations by limiting access to essential internal and external employees, materials, equipment, and service. Such impacts mean that the organization's incoming supply chain and also its customers can be negatively affected. Ever-evolving types and outbreaks of Infectious Disease threats (e.g., COVID-19 coronavirus, West Nile, Ebola, Zika) require organizations to continually evaluate the impact these new threats may have to their existing business and their business continuity plan response.

Within this document are practical guidelines and planning activities that provide a few of the essential tasks your organization should consider for preparation and response to infectious disease.

Aon would like to share with you some important considerations about how organizations can approach the complications and business disruptions that COVID-19, or any other epidemic and pandemic, may cause for your critical operations. In this resource guide we will cover:

- Immediate COVID-19 Response and Management of the Business
- Other Critical Policy and Procedures Considerations

# Immediate COVID-19 Response and Management of the Business

## Incident/Crisis Management

Having a cross-functional team of leaders collaborating to gather accurate information, assess the potential risks and impacts on business operations, and commit to protecting the safety and core services and operations for their employees and customers is key to effectively address the negative effects of COVID-19.

The following guidelines will position you and your Incident/Crisis Management team to quickly establish a strong foundation to get started:

- Designate crisis management team and leader, and set clear expectations on responsibilities.
- Identify or designate contacts at your suppliers, customers, local, state and federal authorities.
- Know your core business functions, operations, and their locations
- Create a communications plan which includes a designated spokesperson(s) to keep relevant audiences abreast of your strategies and action plans
- Identify a COVID-19 team or coordinator to specifically manage the following:
  - Monitoring COVID-19 breaking news, CDC and WHO phases, and local actions at all critical sites
  - Securing workplace health and safety. Some of the tasks the “COVID-19 Coordinator(s)” may perform include:
    - Setting up a system to monitor employees who are ill or suspected to be ill in the event of a pandemic, including contacting employees who are unexpectedly absent from work. Confirm if employee’s general practitioner (GP) has been notified of illness? Have “contact” issues been addressed? Is someone able to care for them?
    - Setting up a process to facilitate / encourage the return of employees to work once they are better or at the end of a quarantine period
  - Identify the local public health authority and identify employees who will liaise with this organization.
- Develop a plan to cover and deliver all core business functions.
  - At each location, identify critical functions and employees and activities that must continue to support the business. Which critical employees’ functions can be performed remotely?
    - Outline a staffing plan for each functional unit
    - Outline a cross-training plan for critical functions
    - Identify employees by category:
      - Essential employees who would and could report to the site
      - Essential employees who can and should work from home
      - Employees who would not be expected to come to the site or work from home due to COVID-19
    - Identify any non-essential functions that can be suspended during the duration of COVID-19. This will determine the type of response needed to keep critical employees in the workplace
    - For those identified essential business functions and critical employees, backup capabilities should be planned, and alternate arrangements should be in place. Critical employees should be aware of their status and the company’s plan to manage their work in the event of COVID-19 cases

- Conduct frequent meetings to stay abreast of the ever-changing events
  - Review progression of COVID-19
  - Issues affecting company
  - People
  - Planning Customers
  - Suppliers
- Virtual Emergency Operations Center (EOC) when co-location and alternate sites are not viable
  - Conference bridge
  - Web / net meetings
- Succession planning with delegation of authority (e.g., how much authority will the delegated leader have while standing-in for the primary leader?)
  - For senior management
  - For crisis management team
- Coordinate activities with authorities
  - Review WHO and CDC announcements
  - Coordinate with state, county and local department of health
  - Work with vendors, suppliers and customers
- Test your COVID-19 response plan to ensure viability – structured walkthrough, table-top, or functional exercises

## Crisis Communications

You may have the most comprehensive and up-to-date plan, but without effective and timely communications of your continuity and response plans with employees, management, business units, government, key suppliers, key customers and key contractors, your plans can fail.

It is critical for organization to establish clear lines of communications with their employees, as well as clients and third-party entities. The following checklist is provided to help organizations quickly identify key communications best practices should a need arise.

### Identify critical stakeholders:

- Employees
- Advisory board
- Vendors
- Customers / Clients / Joint Ventures
- General public
- Public / private entities

### And determine:

- What is the most appropriate method of communications – internet, intranet, website posting, instant messaging, mobile devices, email, blast email, mass voice mail, mass faxes, one-to-one phone, hard copy mailing, etc.?
- Whom within the other organizations should you communicate?
- What is the ideal frequency of communication among stakeholders?

# Immediate COVID-19 Response and Management of the Business

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- Understand the relevance of your message and be clear and concise in communication. You should anticipate information needs of your various audiences.
- Who within your organization should be assigned the responsibility to communicate? Is it different depending on the stakeholder?

Another item to consider is to ensure you have updated employee information to include the latest contacts, phone numbers (mobile, home), email? You want to ensure that all employees get the necessary information they need about the COVID-19 response and protocols.

## **What are your communication strategies if phones are overloaded?**

- Text messaging (SMS)
- Voice over internet (VoIP) or Skype
- Instant messaging

## **Your intranet is a resource to communicate with employees. Consider the following:**

- Should there be a dedicated location on your intranet site or an email portal to transmit and receive information? Who is responsible for updating the information and how often will content be posted?
- If posted on Intranet site, does the information need to be translated?

## Communication Messages

### **Employee Considerations:**

- There may be a high level of fear, anxiety, rumors, and misinformation regarding COVID-19, Regularly share response information and prevention education to reduce employees distress
- Identify how urgent communications (e.g. work schedules) will be disseminated and from whom it will be addressed.
- Communicate employer expectations / disaster service worker obligations to support COVID-19 response
- Ensure that employees know where to go to credible sources of information on COVID-19, such as WHO, CDC and Johns Hopkins Coronavirus Resource Center. Otherwise, they may inadvertently come across social media posts or websites set up by bad actors who may intentionally transmit misinformation or introduce malware or social engineering schemes
- Identify, or develop, informational materials on COVID-19 for employees and their families
- Encourage employees to make personal emergency preparedness plans with their families
  - Offer employees needed home supplies (e.g., non-perishable foodstuffs, paper goods, etc.) at work, so they can avoid shopping in public places
  - Encourage employees to maintain a 30-day supply of necessary medications and medical supplies, as well as an appropriate supply of non-perishable food and water.



**Customer/Client Considerations:**

- Be prepared to answer inquiries about your ability to maintain critical operations that support your customers/clients
- Prepare regularly scheduled updates on your organizations' actions and progress with protecting your customers, clients' interests and experience
- Collaborate with the appropriate cross-functional teams to answer all inquiries accurately and succinctly without compromising proprietary information

**Communications should clearly address what the organization is doing to:****Prepare**

- General COVID-19 information on health safety and protection
- Components of the organization's COVID-19 business continuity plan
- Infection control preparations taken by the business
- How to develop a personal/family disaster kit
- Where to get information during an emergency (e.g. websites, phone numbers)

**Respond**

- Activation of the business's COVID-19 business continuity plan
- Frequent and succinct update reports on the status of COVID-19
- Policy changes to align with the business's COVID-19 business continuity plan
- Infection control measures to be utilized at work
- Illness tracking and reporting
- Job reassignments
- Vendor product/supply needs
- Services and resources available to the public
- Where to get ongoing information (e.g. website, phone numbers)

**Recover**

- Updates on the status of COVID-19
- Job reassignments
- Policy changes
- Communicate with vendors as to status of recovery.
- Deactivation of the business's COVID-19 business continuity plan

# Other Critical Policy and Procedure Considerations

While your Incident/Crisis Management team is working on the overall COVID-19 response, there are other parts of your organization that can play an instrumental role in planning and recovery and should be integrated into your COVID-19 response planning. The following sections offer resource guidance for many of those specific business functions within your organization. As you review the following sections, think about your own organization and consider the necessary arrangements and plans to address the impact of COVID-19 on your operations.

## Policy and Procedure Consideration – Information Technology

There is an ever-increasing role of technology in every business. Technology organizations must have clear strategic direction and priorities that align with the organization's COVID-19 business continuity plans. Information Technology organizations may wish to consider the following efforts during the COVID-19 response:

- At a pre-defined trigger point, put a freeze on all changes to the IT system. Most outages are caused by implementing changes to the system
- Increase capabilities of and test the VPN/network/proxy for remote users to ensure viability and capacity
- Evaluate and enhance data protection and security for any changes made as part of planning efforts
- Remote employees (those identified as staff that can work remotely) should have high-speed internet access
- Determine if the company will provide the hardware, software, WAN access, and support. Increase capabilities of VPN for remote users if it can be implemented quickly.

## Alternative Work Arrangements

Social distancing is extremely important for limiting exposure to COVID-19. Flexible work schedules can enable employees to select and alter their work schedules to better fit personal needs and help balance work, personal and family responsibilities within limits set by the business. Flexible work schedules are voluntary and subject to managerial approval.

Information Technology professionals should partner with human resources personnel to develop policies to implement social distancing measures (e.g. telecommuting, flexible work schedules). If you have a continuity of operations plan, many of these policies may already exist and may only need minor revisions.

### **Policies to Review / Consider:**

- Telecommuting/Telework
- Alternative Work Schedules
- Alternative Work Assignments
- Mutual Aid Work Arrangements
- Evacuation Pay

**Considerations:**

- Can services be provided via phone, teleconference, internet, fax or mail to minimize the time people are in contact with each other?
- Can you adjust business hours to stagger customers/clients interaction during off-peak hours?
- Can you postpone identified services until regular business operations can resume?
- Will your policy permit flexible worksites (e.g. telecommuting/telework)?
- Will your policy permit flexible work hours (e.g. staggered shifts, extended shifts, compressed shifts)?
- Will you make provisions for employees to work at home (without using personal leave) when they are in quarantine?
- Will you make provisions for employees to work at home (without using sick leave) while recovering from illness?
- Will “non-essential workers” be re-assigned for other “essential” duties in other units?
- Will policies for “essential workers” differ from those for “non-essential workers”?
- Will individuals who are more at risk (e.g. immuno-compromised) for severe illness or death from the flu have special assignments in non-direct contact areas that are different from workers who are not considered high risk groups?
- Provide training on standard and virus droplet precautions and the use of personal protective equipment (PPE).

**Telework Considerations:**

- Broaden existing policy to include information specific to COVID-19
- Integrate information specific to COVID-19 into telework agreements
- Determine which employees are eligible to telework
- Offer telework agreements to all eligible employees
- Develop telecommunication infrastructure to provide maximum amount of multi-way communication during emergencies
- Test and ensure telecommunication infrastructure is capable of handling telework arrangements, changes, and securing sensitive information
- Provide appropriate equipment, security clearances and network applications to teleworkers
- Provide telework training for managers and employees
- Ask designated employees to practice telecommuting to confirm operability
- Provide information technology support sufficient to meet telework needs

# Other Critical Policy and Procedure Considerations

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## **Policy and Procedure Consideration – Human Resources**

COVID-19 threatens all operations as a result of its potential impact on human capital (duty of care) concerns. Be sensitive and receptive of your employee's concerns about pay, leave, safety and health. Also, consider potential changes necessary to manage the workload from external inquiries that may result from regulatory and employee-related issues.

### **Policies to Review:**

- Hiring Flexibilities
- Leave Flexibilities
- Pay Flexibilities
- Benefits
- Alternative Work Arrangements
- Occupational Health and Safety
- Restricting Workplace Entry
- Miscellaneous

### **Hiring Flexibilities**

Work with your Human Resources personnel regarding emergency policies that allow for critical need and short-term hiring flexibilities.

### **Considerations:**

- Expedited hiring practices
- Staffing mutual aid agreements
- Employees on paid disability
- Reemploying retirees
- Reemploying buyout recipients
- Reemploying laid-off employees
- Reemploying former employees recovered from a compensable injury
- Contract suspensions
- Virtual hiring practices
- Candidate management and re-engagement
- Remote onboarding

### **Leave Flexibility**

Human Resources personnel can assist with emergency policies that allow for employee compensation during absences due to personal illness, family illness, trauma, isolation, quarantines and/or public transportation closures.

### **Policies to review / consider:**

- Sick Leave
- Family and Medical Leave Act

- Bereavement Leave
- Annual Leave
- Compensatory Time
- Donated Leave Transfer
- Leave Without Pay
- Temporary Shutdown/Layoff
- Business Closure

**Considerations:**

- How will you encourage the sick to stay home?
- How will you respond to employees who are too afraid to come to work?
- How will you address employees who are quarantined?
- How will you deal with employees who stay home to care for family members?
- How will you deal with employees who have used up all their vacation and sick leave?
- Will you offer compensation packages to employees in case of business closure?

**Sick Leave**

**Do your leave policies and procedures include information on the following?**

- Personal medical needs of an employee
- General family care and bereavement purposes
- Care for a family member with a serious health condition
- Requirements for providing medical certification/evidence to support request for sick leave
- Requirements for scheduling sick leave in advance
- Requirements for contacting supervisor to request unscheduled sick leave, including call-in and email procedures
- Requirements for requesting and/or granting advance sick leave
- Denying a request for sick leave

**Family and Medical Leave Act (FMLA)**

Do your leave policies and procedures include information on the following?

- Entitlement to 12 weeks of leave during any 12-month period
- Requirement for notification of need for FMLA leave
- Requirement for medical certification
- Required medical certification form
- Entitlement to unpaid leave in addition to annual and sick leave
- Substituting annual and/or sick leave for unpaid leave

# Other Critical Policy and Procedure Considerations

*Continued from previous page*

## Bereavement Leave

**Do your leave policies and procedures include information on the following?**

- Bereavement purposes
- Requirements for providing evidence to support request for bereavement leave
- Requirements for contacting supervisor to request bereavement leave, including call-in/email procedures
- Granting or denying a request for bereavement leave

## Annual Leave

**Do your leave policies and procedures include information on the following?**

- Requirements for scheduling annual leave in advance
- Requirements for contacting supervisor to request unscheduled annual leave, including call-in and email procedures
- Requirements for requesting advance annual leave
- Scheduling use or loss of annual leave
- Requirements for rescheduling annual leave
- Granting or denying a request for annual leave

## Donated Leave Transfer

**Do your leave policies and procedures include information on the following?**

- Applying to become a leave donor
- Applying to become a leave recipient
- Approving requests to be a leave donor or recipient
- Limitation on donating annual and/or sick leave
- Limitation on using donated annual and/or sick leave
- Accruing annual and sick leave while using donated annual and/or sick leave
- Termination of a medical emergency
- Returning unused donated annual and/or sick leave to leave donors

## Leave Without Pay

**Do your leave policies and procedures include information on the following?**

- Requirements for scheduling leave without pay in advance
- Requirements for contacting supervisor to request unscheduled leave without pay, including call-in and email procedures
- Denying a request for leave without pay
- Effects of leave without pay on employee entitlements and benefits

## Compensation Considerations

Work with your Human Resources personnel regarding emergency payroll policies.

### **Considerations:**

- Overtime pay
- Compensatory time off in lieu of overtime pay
- Holiday pay
- Severance pay
- Evacuation payments
- Criteria for providing advance payments and/or special allowances
- Will pay rates change if employees work from home temporarily?
- Will your disability / workers compensation insurance cover employees and their families if they become ill while in the line of duty?
- Encourage direct payroll deposits

## Temporary Shut Down & Layoff

Work with your Human Resources personnel to review your employee benefit package.

### **Other Compensation Considerations (depending on the duration of the event):**

- Pay Change Communication Plan
- Temporary Pay Cuts
- Delayed Bonuses and /or Merit Increases
- Furloughed Employees
- Hazard Pay
- Sales Compensation aligned with Revenue Forecast
- Equity Plan during Bear Market
- Annual Incentive Design Changes to Executive Pay
- Retention Agreements for Pivotal Talent

## Workforce Reduction and Optimization

### **Considerations**

- Organizational Communication Plan
- Redeployment Options
- Organizational Cost Assessment
- Define Pivotal Roles
- Assess Spans and Layers to Simplify the Organization
- Selection and Assessment of Talent
- Employment Law Compliance (including, Discrimination and WARN Act)

# Other Critical Policy and Procedure Considerations

*Continued from previous page*

- Impact on External Company Brand
- Management and Tracking of Employee Costs
  - For Hiring Flexibility section please add to list of consideration: Virtual hiring practices
  - Candidate management and re-engagement
  - Remote onboarding

## Benefits

Work with your Human Resources personnel to review your employee benefit package.

### **Policies to Consider:**

- Health Insurance
- Disability / Workman's Compensation Insurance
- Retirement
- Life Insurance
- Long Term Care Insurance
- Flexible Spending Accounts
- Employee Assistance Program
- Survivor Benefits

### **Considerations:**

- Be prepared to handle large volumes of insurance claims, both health and death beneficiary
- Be aware of possible changes to employment taxes
- Review disability and death benefits coverage and payment levels. Ensure the ability of your carrier to pay benefits.

## Occupational Health & Safety

### **Considerations**

- Train employees on hand hygiene, respiratory etiquette, recognizing COVID-19 symptoms and what to do if they think they are sick
- Encourage and provide training for employees to develop family emergency plans
- Encourage/offer the seasonal influenza vaccine to employees
- Monitor the COVID-19 diagnosed cases of personnel
- Identify possible exposure and health risks to your employees
- Develop a policy for the management of personnel who are at increased risk for COVID-19 complications (e.g., older adults, people who have serious chronic medical conditions such as heart disease, diabetes, lung disease)
- Develop protocol for employees who become ill at work (follow guidance provided by the CDC)
- Develop a system for evaluating symptomatic personnel before they report for duty
- Develop a system to evaluate when employees recovering from, or completing their self-quarantine period from, COVID-19 may return to work



- Provide infection control / personal protection supplies and equipment (e.g., gloves, alcohol-based hand hygiene products, cleaning/disinfecting materials, etc.)
- Recognize the emotional, mental and physical needs of employees during a catastrophic health event
- Review your Employee Assistance Program (EAP) to ensure it is ready to respond to employee needs during this COVID-19 event
- If you do not have an EAP, identify mental health and faith-based resources that may be available to provide counseling / help employees manage stress during this COVID-19 event

### Restrict Workplace Entry of People with COVID-19 Symptoms

There is an effective way to limit the spread of COVID-19, and that is to ask infected individuals to remain home. Applying the following actions will promote the safety and protection of employees:

- Notify employees they should not come to work if they are not well, particularly if they are exhibiting any COVID-19 symptoms
- Post notices at all workplace/facility entry points advising employees and visitors not to enter if they feel sick or are showing COVID-19 symptoms
- Advise employees to email a preassigned email address or call a designated phone number for reporting illness
- Managers should notify a designated member of Human Resources about any employee absence due to sickness involving COVID-19
- Ensure that ill employees have completed the required self-quarantine period, are healthy and no longer infectious before allowing them to return to work

### Protocol for Employees Who Become Ill

Advise employees that if a person feels ill, or if someone observes that another person is sick or exhibiting symptoms of COVID-19 at work, they are to contact their manager or other designated person and remove themselves to another area away from their co-workers. Telephone or e-mail or e-mail communications are preferable to keep safe distance and barriers from one another. In adults, emergency warning signs\* of COVID-19 can appear 2 – 14 days after exposure, and include:

- Fever (100.4° F [37.8° C] or greater using an oral thermometer)
- Cough
- Difficulty breathing or shortness of breath
- Persistent pain or pressure in the chest
- New confusion or inability to arouse
- Bluish lips or face

*\*This list is not all inclusive. Please consult your medical provider for any other symptoms that are severe or concerning.*

# Other Critical Policy and Procedure Considerations

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## **The following actions can support employee safety and protection:**

- Speak with the individual by phone instead of face-to-face to maintain safe distance and barrier
- Check if the employee has any COVID-19 symptoms or has been exposed to anyone with COVID-19
- If the employee is symptomatic at work, instruct him/her to contact their medical practitioner and remove them from the co-worker population to reduce the risk of transmission.
- Instruct the employee to leave work. If possible, public transportation should be avoided. If public transportation is unavoidable, instruct the employee to cover their mouths and cough or sneeze into a tissue or their sleeve while traveling. Remind employee not to touch nose, mouth or eyes and immediately wash hands when they arrive at their destination.
- Advise the employee to contact a medical professional. This may involve phoning the person's normal doctor or a specially designated center to seek advice.
- Advise the employee on the self-quarantine period of 14 days
- Have the employee's work station disinfected
- Inform supervisor and Human Resources of employee absence and need for coverage
- As able, a Human Resource representative should reach out to the ill employee by telephone or email on a regular basis regarding their health status on the employee during his/her absence from work

## **Miscellaneous – Additional Duties of Human Resources**

- How will your team cover on-going internal Human Resources investigations?
- What is required to address incoming and current EEOC inquiries?
- Can any other Human Resources functions be suspended to allow teams to focus on the most critical response activities for COVID-19?

## **Policy and Procedure Consideration – Security**

Even while an individual can become infected yet show no signs of the infection, remember that they still may be contagious and be able to transmit the disease.

Develop ways to limit contact with the public, and/or customers and vendors through changes in receiving practices, barriers or distance (e.g., remain at least a distance of 6 ft. or more apart). This is especially true for retail, restaurant, hospitality, and other industries where there is direct contact with customers, businesses that operate operations and call centers with employees working in close proximity to each other.

## Security control

- Monitoring
- Alert and alarm procedure and protocols
- Escalating of alarm and alert levels

Consider how you will limit access to the facility or prevent unauthorized entry? In adults, emergency warning signs\* of COVID-19 can appear 2 – 14 days after exposure.

Modify receiving practices to eliminate contact with mailman, UPS, couriers, or delivery truck drivers.

## Deliveries

- Janitorial services
- Cleaning procedures
- Personal Protective Equipment (PPE)
- Disinfectants

## Visitor / Vendor Screening

- When do you restrict?
- How do you restrict?
- What are the exceptions?
- Who can authorize the restrictions?

## Enhanced Security Operations

- Shortages in critical supplies will necessitate security to protect critical assets
- Social disruption may occur, increasing the likelihood of public panic and disorder
- Security policies will need to consider alternative work sites
- The available workforce of security guards will be reduced because of COVID-19
- Some facilities may need to be vacated for periods of time; security for these sites may be necessary
- Evaluate existing security systems, resources for COVID-19
- Workers will need training in any new work practices or PPE use
- Educate employees on the role of each essential facility in case of closure
- Develop procedures for securing buildings, protecting stored supplies, and restricting access
- Create lock-down procedures for buildings to be closed

# Other Critical Policy and Procedure Considerations

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## **Policy and Procedure Consideration – Facilities Management/ Environmental, Health & Safety**

As part of the mission of your Facilities Management teams to deliver safe, comfortable, productive, and sustainable places for your employees to work, so too are they concerned with and fully integrated into your COVID-19 response planning. Collaborating with your many operations teams, your Facilities Managers and EH&S managers will consider how to protect the building site and keep its environment safe. The following are considerations for COVID-19 planning for this team.

- Review facility shutdown procedures and modify to fit the COVID-19 event, following the WHO alert stages
- Identify the local public health authority and identify employees who will liaise with this organization
- Review washroom cleaning details - frequency and procedures & supply

### **Increase Hygiene Management**

- Promote good hygiene practices (e.g., use hand sanitizer with at least 60% alcohol)
- Hand washing (e.g., frequent hand washings for at least 20 seconds each time)
- Possible use of gloves

### **Temporary Provisions**

- Gloves – be mindful of allergic reactions to latex; offer vinyl gloves as an option too
- Cleaning material
- Eye protection
- Gowns
- Aprons

Modify janitorial practices to include sanitation of frequently touched items, possible use of antiviral sprays or products. Influenza virus may live for several days on hard surfaces.

- Increased frequency in cleaning schedule to clear increased amount of trash
- Training
- Cleaning procedure review
- PPE
- Disinfectants re-evaluated

### **Plan for Social Distancing**

Develop workspace separations, or cut-off space within the work setting. Protective barriers can be done with something as simple as plastic sheets, or more substantial barriers. The recommended distance between people, according to the CDC, is at least 6 ft. away.

- Area, space planning ahead
- Cut-offs and separation
- Isolation and quarantine area

Barrier for employees with public face-to-face encounter

- Reception desks
- Counters
- Service line – cafeteria

Protective barrier types identified for each area and plan for equipment and supply needed:

- Temporary
- Permanent

The business can utilize the following additional social distancing strategies to reduce close contact among individuals:

### Telecommuting

- Identify the number of employees who have the technological capability and can therefore adequately perform their primary functions remotely.

### Teleconferences

- Confirm if virtual meetings over the internet is an effective way to communicate.

### Staggering Work Shifts

- Determine the number of employees who do not need to perform their work during the same time of the day and can be spread out over 24 hours.
- The number of employees who can work an extended number of hours in fewer days are [insert number].

### Face-To-Face Barriers

- The number of employees who have regular face-to-face contact with the public that can provide services behind a barrier, by telephone, etc. is [insert number].
- Services that can be re-organized to be provided to the public without face-to-face contact are [insert number and type of service].
- Systems that can be put in place to minimize direct face-to-face contact with the public are [insert systems].

### Alternative Facilities

- Business may choose to make its alternative facilities, along with other locations, available to implement social distancing.
- Position or designee shall determine which essential functions/services can be conducted from a remote location and those that must be performed at [Business] facility.

*[Insert other infection control strategies that can be used to reduce the spread of disease between employees who must have face-to-face contact with others.]*

# Other Critical Policy and Procedure Considerations

*Continued from previous page*

## **Considerations:**

- Encourage sick employees to stay at home.
- Minimize situations where groups of people are crowded together, such as in a meeting.
- When meetings are necessary, avoid close contact by keeping a separation of at least 6 feet, where possible, and assure that there is proper ventilation in the meeting room.
- Workplaces which permit family visitors on site should consider restricting/eliminating that option during this COVID-19 event.
- Work sites with on-site day care should consider in advance whether these facilities will remain open or will be closed, and the impact of such decisions on employees and the business.

## **HVAC – Protect Air Quality**

Identify ways to improve workplace air quality through air filtration or increased air changes

- Flow rate adjustment
- Cleaning of filters, frequency, procedures, and considered third vendor
- Third party cleaning vendors
- Training
- Liability
- PPE

HVAC systems specifications to plan for protection

- Filters types and changing procedures
- How much air recycling

## **Education and Screening**

- Posting educational information throughout the facility (e.g., Wash your hands often with soap and water for at least 20 seconds; use an alcohol-based hand sanitizer with at least 60% alcohol, etc.)
  - Work with Security on screening of sick workers and visitors. In adults, emergency warning signs\* of COVID-19 can appear 2 – 14 days after exposure, and include:
    - Fever (100.4° F [37.8° C] or greater using an oral thermometer)
    - Cough
    - Difficulty breathing or shortness of breath
    - Persistent pain or pressure in the chest
    - New confusion or inability to arouse
    - Bluish lips or face
- \*This list is not all inclusive. Please consult your medical provider for any other symptoms that are severe or concerning.
- Avoid face-to-face meetings. Look at ways to use internet or phone to do business. Promote teleconferencing.
  - Close off meeting rooms – use them for other purposes (quarantine rooms and areas, etc.)

The workplace environment should be made as clear and barrier-free as possible. Remove magazines and papers from waiting areas or break rooms. Clean, reduce or remove the use of:

- Cups
- Dishes
- Cutlery and utensils – or consider replacing with individually plastic wrapped cutlery and utensils
- Magazines and other unneeded objects from the waiting area, cafeteria, lunch area

Staggered lunch period to reduce masses at any one time

- Hard surface cleaning
  - Sink
  - Handles & door knobs
  - Railings
  - Objects
  - Counters
  - Reception area
- Emergency supply increase and update monitoring and reporting
- Ensure all automatic protection is in service and will be in service should the building have to be evacuated rapidly if ordered by health officials
- Physical barriers review – tightness, cleaning procedures, and frequency
  - Fence
  - Walls
  - Floors
  - Windows
  - Interspatial, above dropped ceilings, and sub-floor areas
  - Plenums
- Arrange for shift work options for those workers who may need to stay home with children. Shift work will also have fewer employees on site at the same time, limiting possible exposure and spread of the flu.
- Increase gap / time between work shifts. The recommended practice is to space apart the time between shifts, reducing contact -- and possibility of transmission --among workers, and may provide some time for cleaning or ventilation of the workplace

## Enhanced Health & Safety Protocols

- Safeguarding the health of employees, customers, vendors, and the public from COVID-19 is a key objective. A variety of infection control measures, including heightened hygiene practices and social distancing may be utilized to slow the spread of disease.

## Hygiene

- Employees will be educated and reminded of hygiene measures that help to limit the spread of COVID-19. These include:
  - Use respiratory etiquette (e.g. covering cough or sneeze with a tissue or cloth; sneeze into elbow if tissue not available).

# Other Critical Policy and Procedure Considerations

*Continued from previous page*

- Avoid touching your nose, mouth, and eyes.
- Properly clean hands with soap and water for at least 20 seconds, or apply hand sanitizer regularly, especially after you cough, sneeze or blow your nose.
- Avoid direct skin to skin contact with others, such as hand shaking hands. Substitute hand shaking with alternatives like waving, smiling, nodding, elbow bumping and bowing. Wash your hands after contact with others.
- Wash your hands upon removal of gloves.
- Whenever possible, do not use other employees' phones, desks, offices or work tools and equipment.
- Keep work areas and home clean and disinfected.
- Stay home when ill and do not send ill children to school or day care.

The following hygiene and safety measures will be taken to reduce the spread of disease:

- Hand washing instructions will be posted in washrooms.
- Cover Your Cough reminders will be posted in waiting rooms and common areas.
- Magazines/papers will be removed from waiting rooms and common areas.
- Hand sanitizer will be available in waiting rooms and common areas.
- Tissues and trash cans will be available in waiting rooms and common areas.

## Infection Control Supplies

- The following infection control supplies are regularly available and may be needed by employees for COVID-19.
- Soap within bathrooms
- Soap within kitchen areas
- Alcohol-based hand sanitizer (minimum 60% alcohol content)
- Paper towels
- Tissues
- Garbage bags and trash cans
- Office disinfectants
- Personal protective equipment
  - Gloves
  - Cleaning products (e.g., disposable wipes)
  - Hand Sanitizer (e.g., must contain at least 60% alcohol)

## CDC Guidelines on Masks:

- CDC does not recommend that people who are well wear a facemask to protect themselves from respiratory illnesses, including COVID-19.
- Masks are only recommended for those diagnosed with COVID-19 and showing symptoms or have been instructed by health practitioners to wear them.



The use of facemasks also is crucial for health workers and other people who are taking care of someone infected with COVID-19 in close settings (at home or in a health care facility).

### Considerations

- Stockpile necessary supplies
- Storage
- Budgeting
- Alternative vendors
- What if employees believe they have not been given the proper personal protective equipment (e.g. gloves, cleaning materials) to keep them from becoming infected and refuse to come to work?
- How will you cope with employees who do not want to work at the site?

### Workplace Cleaning

- Keep work surfaces, telephones, computer equipment and other frequently touched surfaces and office equipment clean.
- Be sure that any cleaner used is safe and will not harm your employees or your office equipment. Use only disinfectants registered by the Environmental Protection Agency (EPA), and follow all directions and safety precautions indicated on the label.
- When employees who are suspected to potentially have influenza have left the workplace, thoroughly disinfect their work area and any other known places they have been.
- The janitorial service charged with cleaning and disinfecting the area should be properly trained on the use of all cleaning products and safeguards against infection. Hands must be washed or sanitized at the completion of the procedure.

### Recommended Workplace Disinfectants

| Disinfectants  | Recommended Use   | Precautions  |
|--|---|--|
| <p>Sodium Hypochlorite</p> <p>One part bleach to 100 parts of water, or 1:100 dilution. Usually achieved by ¼ cup bleach for 1½ gallons water.</p> | <ul style="list-style-type: none"> <li>▪ Disinfection</li> </ul>  | <ul style="list-style-type: none"> <li>▪ Should be used in well-ventilated areas.</li> <li>▪ Utilize gloves while handling and using bleach solution.</li> <li>▪ Do not mix with strong acids to avoid release of chlorine gas.</li> <li>▪ Corrosive to metals and certain materials.</li> </ul> |
| <p>Alcohol</p> <p>(e.g. Isopropyl 70%, ethyl alcohol 60%)</p>  | <ul style="list-style-type: none"> <li>▪ Disinfection</li> <li>▪ Smooth metal surfaces, tabletops and other surfaces on which bleach cannot be used.</li> </ul> | <ul style="list-style-type: none"> <li>▪ Flammable and toxic. To be used in well-ventilated areas. Avoid inhalation.</li> <li>▪ Keep away from heat sources, electrical equipment, flames, and hot surfaces.</li> <li>▪ Allow it to dry completely.</li> </ul>                                   |
| <p>Insert EPA Approved Disinfectant</p>  | <ul style="list-style-type: none"> <li>▪ Follow directions on label</li> </ul>  | <ul style="list-style-type: none"> <li>▪ Follow precautions on label.</li> </ul>   |

# Other Critical Policy and Procedure Considerations

*Continued from previous page*

## Policy and Procedure Consideration – Supply Chain

Your supply chain is also at risk with the threat of COVID-19. With COVID-19 present, businesses need to gather and quantify information regarding key components of their critical supply chain.

Aon has developed the following pandemic preparatory checklist which can assist companies in determining the resiliency of key suppliers to withstand the effects of a disruption resulting from COVID-19 outbreak. Many portions of this list will also be helpful in preparing for other emergencies. We encourage companies to work closely with business continuity management, key business and product stakeholders, fulfillment and operations, as well as other applicable internal parties as identified.

### Business Continuity Strategy

- In the event of COVID-19 related disruption, does the supplier have documented plans for business unit continuity and/or information technology disaster recovery (IT DR)?
- Does the supplier’s Business Unit Continuity Plan or IT DR Plan identify critical business processes and their recovery priority?
- Do the supplier’s planning efforts take into consideration the absence of a large number of critical employees over an extended period of time?
- What is the expected recovery time for the supplier’s “mission-critical” business processes?
- Does the plan account for both internal and external interdependencies to the organization?
- Do the supplier’s current plans address all the locations from which it provides services to the inquiring company?
- Is the supplier’s primary IT facility or data center located in the same building or office complex occupied by its main business or operations employees?
- Does the supplier have other locations which can (or could) provide the goods or services currently being used by the inquiring business?

### Crisis Communications

- Does the supplier have a Crisis Management Team currently in place consisting of senior management personnel?
- Does the Crisis Management Team and Plan address both internal and external communications during the COVID-19 event?
- How and to whom would the supplier notify at the inquiring company of an outage that affects its operations?

## Policy and Procedure Consideration – Travel

Business travel is critical to business relationships and creates solid foundations for future collaborations. Business travel accommodates face-to-face interaction and reduces miscommunication and builds unity between businesses.

The spread of COVID-19 has prompted many business and organizations to reconsider the need for business. In the next sections are some thoughts and considerations recommended to enhance your COVID-19 response planning about travel.

## Travel Restrictions

### Business Travel

- Ensure any travel restrictions have been vetted and approved by in-house counsel
- Can business be executed using alternative means (i.e., video conferencing, teleconferencing, etc.)?
- Is there an existing policy to restrict business travel?
- At what point is business travel restricted, should the policy coincide with the government's threat levels?
- If possible, travel during non-peak travel periods or to unaffected areas first
- Develop a strategy if a critical country border has been closed
- Is there a relationship with an international medical provider during traveling? If so, how do you contact them for medical evacuation or evacuation of remains?
- How and when do you bring ex-pat stranded in a foreign country back home, and is there an extraction policy? Additionally, what is the policy for the evacuation of ex-pat remains?
- Is there a medical evacuation policy in existence, who is eligible?
- Has a relationship been developed with international medical providers for the care of employees?
- If necessary to travel, will everyone know the safety and protective protocols to keep themselves healthy?
- If travel is necessary, is there a policy / process to manage returning travelers from affected countries, (e.g., COVID-19 detected within countries traveled in the past 30 days?)
- As much as possible, initiate social distancing, minimize contact within 6 feet
- Is there a 14-day quarantine policy for travelers returning from an affected area?

### Expatriate Evacuation Plan

- Are there expatriate families living in other countries? Is there a policy to evacuate expatriate families?
- What is the frequency and content of communications with expatriate families?
- What are their responsibilities?

### Personal Travel

- Is there an existing policy to restrict personal travel?
- Should the company restrict non-essential personal travel to areas where an outbreak has occurred?
- Is there a 14-day quarantine policy for travelers returning from an affected area?
- Determine the extent of outbreak

# Other Critical Policy and Procedure Considerations

*Continued from previous page*

## **Coordinate Activities With:**

- Human Resources
- Supply Chain
- Production Planning
- Engineering
- Support Services
- Legal

## **Strategies / Alternatives**

- Align your travel restriction plan with the WHO Pandemic Phases and Management Strategies
- Continuous review of websites for spread of COVID-19 and country border closings,
- Identify paperwork necessary to enter countries once COVID-19 is announced,
- If travel is necessary, discuss home quarantine for 14 days after returning to home,
- Allow the individual the opportunity to work from home
- Development of procedures for employees returning home from infected areas (request self-quarantine for 14 days before returning to work), document all people they have been in contact with, follow public health agency instructions, develop policy for continuous contact with individuals during absence, setup process to ensure employee has completed time duration and is healthy to return to work.

## **Policy and Procedure Consideration – Risk Management**

The COVID-19 event has commanded the attention of risk management and the focus for evaluating impacts on your business operations, developing controls and mitigations to reduce or eliminate risk to operations. Following are some considerations for your Risk Management teams to protect your business amidst the COVID-19 event.

- Assess your insurance coverages after a comprehensive assessment of your business and determine if there is sufficient coverage.
- Coordinate coverage needs with risk assessment of COVID-19 – model your economic impact for days up to months.
- If insurance coverage does not exist or apply, consider other loss control or mitigation efforts to lessen the risk or cost.
- Be prepared to absorb the losses – insurance may not cover.
- Collaborate with insurers, health plan providers and major healthcare facilities to review and update utilization options

## Policy and Procedure Consideration – Legal & Ethical Issues

COVID-19 can impact all aspects of your business, therefore you must ensure that you are meeting all legal and ethical obligations you're accountable for given the changes and response activities that are necessary to protect your business. Following are some thoughts and considerations for integrating legal and ethical practices into your COVID-19 response planning.

### **Is there a legal framework in place for your company's response?**

#### Role of Legal Counsel

Ensure that all business-driven activities taken in response to an infectious disease outbreak are reviewed by in-house or external counsel prior to implementation.

#### Employee Relations

Are there any labor contract restrictions if contract employees or retirees are rehired?

What will be the legal issues if requiring long term employees by requiring fearful employees to come to work particularly if no alternatives are available?

#### Regulatory Concerns

OSHA requires employers to ensure that employees are not exposed to conditions that will cause death or serious physical harm. If an infected employee comes to work and spreads the virus, to others, the employer could potentially face OSHA violations, workers compensation claims and, in some jurisdictions, worker lawsuits, unless precautions are taken to lessen the threat.

#### Privacy Issues

Observing health privacy under HIPPA could raise challenging issues with the COVID-19 event. Without a clear understanding of what illnesses, or exposure to illnesses, an employee is obligated to disclose, employers could leave themselves wide open to privacy invasion and discrimination claims. The actions of public authorities will have a bearing on reporting requirements, and potential insulation for employers.

#### Planning Requirements

Developing policies that address the following issues:

- Education
- Corporate travel
- Operating procedures
- Hygiene / Health etiquette

# Other Critical Policy and Procedure Considerations

*Continued from previous page*

## Policy and Procedure Consideration – Purchasing

Your organization's Purchasing Team will endeavor to address and manage critical resources, materials, and services accessible and available for your business, but they are bound to run into issues and consequences from the impact of COVID-19. Following are some thoughts and considerations for your Purchasing Team to include in their plans and to keep them aligned with the organization's COVID-19 response planning.

- Assume many core items/critical inputs (just-in-time) will not be available and plan resource usage accordingly, or identify replacements or substitutes
- Shipping of goods and materials may be severely disrupted, particularly from overseas.
- Potential shortages of dock workers or truckers will contribute to the disruption of the flow of goods.
- Assume outsourced parts of operations (locally or internationally) may be disrupted.
- Port authority issues/border closings may be important considerations in movement of goods and materials.
- Where are your critical supplier(s) located?
- What are the most critical supplies?
- Are you prepared if key people are unavailable?
- Are you prepared for other modes of transportation/communication with suppliers?
- Understand the company's operational structure and relationships between supply for materials and demand required to keep business operational. Supply chain vulnerability/hardening options include:
  - Critical location analysis
  - Critical customer analysis
  - Critical material analysis
  - Sufficient capacity analysis
  - Short-term crisis response analysis
- Identify critical inputs or raw materials that may be in short supply because of COVID-19 due to demand changes or transportation issues.
- Transportation may be affected, truck driver's numbers reduced, and fuel may be in short supply if refining is affected.
- Identify supplies that originate from outside of the country and look for substitutes if travel and trade restrictions are imposed.
- Jointly plan with key suppliers.
- Identify high demand/low demand products.

## Policy and Procedure Considerations Given COVID-19 – Investment and Retirement

### Investment Considerations Given COVID-19

COVID-19 has had strong impacts on the investment markets, including declining equity returns, increasing volatility, decreasing Treasury yields, decreased liquidity, and increased transaction costs. Below are some possible considerations for investment portfolios:

1. **Rebalance:** Consider rebalancing public equity positions that have drifted outside of policy. First, follow your investment policy (assuming policy has been reviewed and updated in past few years). Rebalance if needed to stay in policy, move toward your target allocations. Market volatility may make it difficult to move to the policy allocations; thus, a legging-in approach may be appropriate – moving back toward policy over a few consecutive weeks.
2. **Reduce Treasury exposure and duration:** The large drop in government bond yields means that some profit taking is warranted. Consider being sellers of government debt to fund other opportunities. Investigate if the current ultra-low interest rate environment represents an opportunity to reduce the interest rate duration.
3. **Manage Credit Exposures:** Credit spreads are historically wide, increasing the appeal of credit strategies. In addition, review guidelines for active investment grade fixed income managers to reduce the need to become a forced seller of downgraded securities, as there is likely to be a wave of downgrades in the coming months, and it may work to your advantage to not be a forced seller of these bonds.
4. **Assess Liquidity:** Review the amount of liquidity relative to the net cash outflows. Be cognizant of whether the economic environment will change the expected contributions, and how that could impact liquidity, particularly the relationship between public and private asset liquidity.
5. **Be Prepared for Opportunities:** If you have ample liquidity, expect to see interesting opportunities in public and private markets as well as other areas such as real estate. Owning idiosyncratic strategies that capitalize on dislocations or attractive pricing remain interesting. We are beginning to see some new strategies emerge.
6. **Look Through the Lens of Enterprise Risk Management:** Be mindful of all the different facets of a potential liquidity squeeze across the portfolio and enterprise. At the portfolio level (i.e. private investment capital calls), at the market trading level, and at the enterprise (total organization) level.

## Non-Investment Impacts of COVID-19 on Retirement Plans

### Defined Benefit (DB) plan sponsors will want to understand impacts and opportunities

As employers see funded status erosion from recent market volatility, it's important to understand the impact on short and long-term costs – cash funding, financial statement expense, and PBGC premiums. Assumptions should be reviewed to ensure they're still appropriate. Changing conditions may also present attractive settlement opportunities, allowing plan sponsors to offload at least a portion of the liability.

#### Considerations

- Review Cost Projections
- Confirm Methods and Assumptions
- Consider Settlement Opportunities

### Defined Contribution (DC) plan sponsors and participants may be faced with tough decisions

Employees are likely seeing big losses in their retirement savings, which may delay plans for those close to retirement, and create anxiety in others who are watching years of savings erode. Looking back to the 2008 financial crisis, we saw a spike in DC plan complaints leading to litigation, and many plan sponsors who chose to suspend employer matching contributions temporarily. Plan fiduciaries should review their governance structure and follow processes carefully to mitigate risks.

Sponsors in financial distress will want to understand the rules and implications of reducing or suspending employer contributions. Looking ahead, we expect to see more plan sponsors including lifetime income options in their DC plans which will provide more retirement income security in the future. Companies with robust financial wellbeing programs will have a workforce better equipped to manage these uncertain times.

#### Considerations

- Ensure Strong Governance
- Review Plan Design
- Consider Lifetime Income Options
- Address Broader Financial Wellbeing
- Review plan administration to verify that your administrative recordkeeper's website and call centers are not experiencing significant disruptions.
- Address regulatory changes to administer the new rules in the stimulus bill

Please see the applicable Disclosures and Disclaimers on page 31.



## Managing the Business Through COVID-19 – Final Thoughts

Aon's team of business continuity management consultants are available to you and have coordinated efforts to support the development of business continuity management programs and COVID-19 plans.

This Tool Kit has been designed and prepared as a resource for clients and industry peers to provide insight on risk exposures and human capital (duty of care) concerns emanating from an infectious disease event or outbreak. Organizations should consider strategies like the ones provided in this Tool Kit to prepare and safeguard their employees and businesses and begin planning policies and protocols. Other areas of focus for organizations should include business contingency risks, such as supply chain risk, alternate capacity operations, as well as duty of care exposures, such as employee communications, absenteeism and succession planning.

We encourage organizations to seek guidance from health agencies, including the Centers for Disease Control (CDC) and the World Health Organization (WHO), as well as local government entities for a comprehensive and timely view of the current situations as well as information about the nature and characteristics of the virus itself.

If you have specific inquiries on COVID-19 preparedness, an Aon representative is available to answer your questions.

Below are some reference materials, websites, and education links to further assist you in your COVID-19 response planning:

Aon's Coronavirus Response Webpage:

[www.aon.com/coronavirus](http://www.aon.com/coronavirus)

Centers for Disease Control and Prevention:

<https://www.cdc.gov/media/dpk/diseases-and-conditions/coronavirus/coronavirus-2020.html>

Guidance on Preparing Workplaces for COVID-19:

<https://www.osha.gov/Publications/OSHA3990.pdf>

World Health Organization:

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/events-as-they-happen>

U.S. Department of Health and Human Services – Pandemic Influenza Plan 2017 Update:

<https://www.cdc.gov/flu/pandemic-resources/pdf/pan-flu-report-2017v2.pdf>

International Facility Management Association – Coronavirus Preparedness:

<https://www.ifma.org/news/what's-new-at-ifma/what's-new-at-ifma-details/2020/03/04/coronavirus-preparedness-resource-center>

Society for Human Resource Management (SHRM.org) – COVID-19 Preparation:

<https://www.shrm.org/resourcesandtools/pages/communicable-diseases.aspx>

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For further information on our capabilities and to learn how we empower results for clients, please visit [aon.mediaroom.com](http://aon.mediaroom.com)

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