Annex 10

PANDEMIC / MRSA EVENTS
PANDEMIC/METHICILLIN-RESISTANT STAPHYLOCOCCUS AUREUS (MRSA) PROTECTION PLAN

<table>
<thead>
<tr>
<th>INCIDENT COMMANDER</th>
<th>Mall Manager or Designee (MOD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>LIAISON OFFICER</td>
<td>Office Administrator or member of IMAT</td>
</tr>
<tr>
<td>SAFETY OFFICER</td>
<td>Security Director or Asst. Security Director</td>
</tr>
<tr>
<td>PUBLIC INFORMATION OFFICER</td>
<td>Director of Mall Marketing or member of IMAT</td>
</tr>
<tr>
<td>OPERATIONS SECTION CHIEF</td>
<td>Operations Director or Maintenance Supervisor</td>
</tr>
<tr>
<td>ADDITIONAL REFERENCES</td>
<td></td>
</tr>
</tbody>
</table>

**SIMON Pandemic/MRSA Plan Overview**

A pandemic is an epidemic of infectious disease which is spreading through human populations across a large region; for instance a continent, or even worldwide. A widespread endemic disease which is stable in terms of how many people are getting sick from it is not a pandemic. Further, flu pandemics exclude seasonal flu, unless the flu of the season is a pandemic. Throughout history there have been a number of pandemics, such as smallpox and tuberculosis. More recent pandemics include the HIV pandemic and the 2009 flu pandemic. Pandemics result in serious health effects to large proportions of the population with significant disruption to the community, economy and businesses. Impacts of a pandemic could include:

- Widespread disruption to business: 20 to 50 percent of the working population may be unable to work for two to six weeks during the initial and recurrent pandemic outbreaks;
- Significant temporary loss of people to operate the business, accompanied by a significant death rate with loss of people and experience;
- Loss of service from key suppliers and business partners;
- Loss of other services: transportation, travel, Government departments, retail;
- Potential impact on essential services – Fire, Police and Health Services.
Purpose and Scope
This plan provides SIMON with guidance and tools to manage pandemic influenza; including prevention, response, business continuity and communications. This plan and guidance applies to SIMON and Kravco SIMON-managed properties and SIMON’s entire workforce.

Corporate Executive Management Team
The pandemic/MRSA plan operates under the governance of the Corporate Crisis Management Plan. Activation of the Corporate Crisis Executive Management Team will follow the procedures and criteria included in the Comprehensive Emergency Management Plan (CEMP).

Corporate HR
Corporate HR will:

- Provide the Corporate Crisis Executive Management Team with counsel in managing the preparation and response to the pandemic;
- Monitor the pandemic and recommend appropriate actions;
- Liaise with, and provide medical guidance to, SIMON corporate office and field;
- Provide a key contact with relevant Government and non-Government institutions on SIMON’s preparation and response to the pandemic, as appropriate.

Key Strategies
This pandemic/MRSA plan is based on proven methods to manage infectious disease and maintain business continuity. The plan includes four key strategies:

- **Prevention** - prevent exposure to and transmission of the virus by implementing education and hygiene programs.
- **Response** - limit spread of infection and implement response measures to reduce workplace exposures.
- **Business Continuity** - develop plans which consider influenza pandemic scenarios.
- **Communication** - establish SIMON as a trusted, reliable and accurate source of information for our workforce and shareholders.

SIMON Actions Align with World Health Organization (WHO) Pandemic Phases

- **Phase 1**: Inter-pandemic period; low risk of human cases
- **Phase 2**: New virus in animals, no human cases; higher risk of human cases
- **Phase 3**: Pandemic alert; no or very limited human-to-human transmission
• **Phase 4**: New virus causes small localized clusters of human cases with limited human-to-human transmission

• **Phase 5**: Significant localized human-to-human transmission, regional cluster(s)

• **Phase 6**: Pandemic; sustained human-to-human transmission, multi-regional or global spread

**Communication Responsibilities under the Plan**

**Corporate**

- Maintain pandemic influenza Website and linkages to all plan materials and resources
- Develop and deploy key corporate messages
- Provide timely updates and alerts, as necessary
- SIMON executive spokesperson to be identified on this issue
- Provide communication support to Affiliates/Sites through the Pandemic Influenza Advisory Team

**Field Locations**

- Maintain alignment with key corporate messages and communications
- Deploy appropriate communications and key messages to the workforce; increase awareness and education on pandemic influenza
- Provide appropriate and timely communication to business unit shareholders, including suppliers, business partners, Government and communities

**Pandemic/MRSA Plan Modules**

The following four appendices contain guidance and tools to assist field locations in developing a plan to manage pandemic influenza. These materials are available and will be updated on the Human Resources Influenza Website, which is still in the process of being developed.

**Prevention**

- Pandemic/MRSA education and tools

**Response**

- Limit introduction and spread of the virus - guidance and recommended practices for the workplace.
- Assessment of medical readiness - guidance to assess readiness for infectious disease for use by medical providers at SIMON.
- Travel restrictions - criteria for, and implementation of, a program to manage travel restrictions.
Business Continuity Plan (BCP)
- Business Continuity - guidance and BCP checklist for pandemic influenza
- Human Resources – general guidance on Human Resources policies

Communications Planning
- Tools to assist the field with development of a communications plan

Prevention Module

Prevention – Infectious Disease Education Purpose
Prevention includes providing infectious disease education which is medically sound and provides consistent information to the workforce on disease identification, impacted populations, transmission, prevention and treatment.

Target Audiences
- SIMON employees
- SIMON contractors
- Security Providers
- Medical professionals
- Secondary audiences are: customers, tenants and the families of everyone included on this list

Deployment
- Through leadership teams/points of contact to workgroups
- Topic for Government/Community meetings and/or Quarterly Safety Committee meetings
- Materials placed on SIMON intranet

Attachments:
- Influenza education presentation
- Hand washing poster and employee handout
- Home preparedness document
- Cough containment poster
Handouts and/or Posters

HAND WASHING - VITAL TO PREVENTION OF THE FLU

Keeping hands clean is one of the most important steps we can take to avoid getting sick and spreading germs to others. It is best to wash your hands with soap and clean running water for 10-20 seconds. However, if soap and clean water are not available, use an alcohol-based product to clean your hands. Alcohol-based hand rubs significantly reduce the number of germs on skin and are fast acting (Appendix A).

When washing hands with soap and water:

- Wet your hands with clean running water and apply soap. Use warm water if available.
- Rub hands together to make lather and scrub all surfaces.
- Continue rubbing hands for 10 - 20 seconds.
- Rinse hands well under running water.
- Dry your hands using a paper towel or air dryer. If possible, use your paper towel to turn off the faucet and open the door prior to disposing of it. If paper towels aren’t available you are still safe however, as this virus struggles being transmitted from inanimate objects.
- Remember: If soap and water are not available, use alcohol-based gel to clean hands (Appendix A).

When using an alcohol-based hand sanitizer (Appendix A):

- Apply product to the palm of one hand.
- Rub hands together.
- Rub the product over all surfaces of hands and fingers until hands are dry.

When should you wash your hands?

- Always before touching your face, mouth, nose or eyes;
- Before preparing or eating food;
- After going to the bathroom;
- After changing diapers or cleaning up a child who has gone to the bathroom;
- Before and after tending to someone who is sick;
- After blowing your nose, coughing, or sneezing;
- After handling an animal or animal waste;
- After handling garbage;
- Before and after treating a cut or wound.

Annex 10 - 6
CONTAIN YOUR COUGHS AND SNEEZES!

Unprotected coughs and sneezes when you have the flu (influenza) or a common cold can infect others around you. Help stop the spread of the disease by following some of the following suggestions:

- Cover your coughs and sneezes with a tissue and dispose of it after using.
- Sneeze into your sleeve instead of your hands to minimize transmission to others if tissues are not available.
- Distance yourself, by at least 3 feet, from others when sneezing or coughing.
- Wash your hands with soap and warm water or an alcohol-based hand cleaner (Appendix A) after sneezing or coughing.

HOME PREPAREDNESS

In case of a pandemic, we suggest you make preparations for you and your family members by supplying your home with the following items:

At home:

- Supplies for coughs and congestion: Tissues, surgical masks, decongestants, cough suppressants, fever reducers
- Maintain a supply of alcohol-based hand cleaners (Appendix A) where practical
- Food and water supplies for 10-15 days
- Flashlight and batteries
- Reliable thermometer for human use
- Clean water supply or a water purification system
- Sufficient supply of cash in case banks are unavailable
- Identification and key documents (health records, passports, Government-issued ID)
- Medical supplies and a generous supply of prescription medications
- Pet food

Stay home from work and call your health care provider if you have:

- A sudden onset of respiratory illness AND
- A fever greater than 100.4F AND
- A cough AND
- One or more of the following symptoms: sore throat, joint aches, muscle aches or weakness
Contact your supervisor if you are unable to come to work.

Response Module

Corporate Guidance: Limit the Spread of Pandemic/MRSA Events

Within SIMON Facilities

Purpose

A containment plan is needed to rapidly deploy strategies to limit the spread and impact of infectious disease, such as pandemic influenza or MRSA. These plans are to be developed by the field based on their specific circumstances and implemented in response to a local or regional epidemic, and by the corporation in the event of a pandemic. Although these steps are in regard to circumstances “post-outbreak,” some aspects can be implemented “pre-outbreak” as well.

To limit the spread it is important to ensure appropriate actions and communications, including: adequate continuous cleaning of shared hard surfaces (e.g. conference room tables, common areas, and entrances), safe food preparation practices and availability of adequate hygiene (hand and respiratory) supplies.

Scope

Applies to the workforce and SIMON facilities and operations, worldwide.

General Considerations

The underlying principles are to:

- Prevent introduction of infectious disease to the workplace by screening individuals for symptoms of influenza, MRSA, or recent exposure to places with active infections
- Upon the onset of a pandemic prepare protocols for increase workloads and/or personnel shortages and update annually
- Minimize the frequency of person-to-person contact
- Maintain adequate distance between individuals in the workplace
- Manage illness in the workplace to prevent further spread of the virus
- Meet with local stakeholders and review the elements of the local emergency response preparedness to a pandemic
- Develop a plan using communication templates, providing for the languages common to the geographical customer base, to educate the public
- When responding to incidents which there are a potential for exposure to flu pandemics, personnel will utilize protective equipment such as rubber gloves and masks such as the N95 mask or CPR face-shields.
- Whenever possible the staff will avoid physical contact with anyone suspected of having a contagious health issue.
• Keep all personnel from accidental exposure to an infectious pandemic by providing the appropriate health equipment and sanitizers

**Housekeeping Should**

• Clean and decontaminate all surfaces and equipment which have been contaminated with potentially infectious materials.
• Use appropriate sanitizing/cleaning solutions.
• Properly dispose of contaminated waste. Immediately change, clean, and disinfect mop water and materials used for clean-up. Do not reuse mop water.
• All responding employees must wash their hands with soap/sanitizer after being exposed to an infectious incident.

**Exposure**

An exposure is when potentially infectious person comes in physical contact with an employee, tenant or customers, either directly or indirectly. The following procedures should be observed when an exposure occurs:

• Exposed should be treated in an appropriate manner.
• The exposed employee must immediately wash the exposed area with soap/sanitizer.
• The employee/contractor’s appropriate supervisor should be notified.
• Anyone exposed should be offered a post exposure medical evaluation to determine if the onset of influenza/MSRA may occur.

**Office based workers**: strategies can include canceling meetings and training, standing down non-essential workers, telecommuting or alternate work locations, and controlling access to the workplace.

**Operating environments**: additional considerations should include management of shift changes, short term deferral of projects, control of access by contractors, and stand down of non-essential activities and operations.

**Remote locations**: special considerations may be needed for remote locations, company-managed residential camps and medical facilities. Isolation and quarantine areas may be needed for infected individuals if evacuation is not possible.
<table>
<thead>
<tr>
<th>WHO Phase 3</th>
<th>WHO Phase 4</th>
<th>WHO Phases 5 &amp; 6</th>
<th>Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Medical Readiness</strong></td>
<td>Assess healthcare system preparedness of local medical capabilities</td>
<td>Confirm current level of preparedness</td>
<td>Confirm current level of preparedness</td>
</tr>
<tr>
<td>Consider ensuring access to oral thermometers and/or tissues for work and home use</td>
<td>Consider ensuring access to oral thermometers and/or tissues for work and home use</td>
<td>Consider ensuring access to oral thermometers and/or tissues for work and home use</td>
<td>Management Team in consultation with local health providers</td>
</tr>
<tr>
<td>Establish point of contact with local medical providers and health department</td>
<td>Confirm healthcare system contacts</td>
<td>Engage contacts as necessary</td>
<td>Management Team in consultation with local health providers</td>
</tr>
<tr>
<td>Identify resources to manage large scale loss and grief</td>
<td>Confirm large scale loss contacts</td>
<td>Engage contacts as necessary</td>
<td>Management Team in consultation with local health providers</td>
</tr>
<tr>
<td>Ensure adequate hygiene and hand washing supplies for employees (Appendix A)</td>
<td>Ensure adequate hygiene and hand washing supplies for employees (Appendix A)</td>
<td>Ensure adequate hygiene and hand washing supplies for employees (Appendix A)</td>
<td>Management Team in consultation with local health providers</td>
</tr>
<tr>
<td><strong>Property Access</strong></td>
<td>Set up prominent notices at all entry points advising staff, visitors and contractors not to enter if they have symptoms of influenza during the normal flu season</td>
<td>Reinforce general infection control notices around the workplace – entrances, conference rooms, restrooms, common areas, and notice boards; consider next stage if located proximate to this outbreak</td>
<td>Limit access to essential personnel only</td>
</tr>
<tr>
<td>Determine if pre-entry personnel temperature screening is going to be utilized at a later stage and time; recommend ordering supplies now (?)</td>
<td>For large facilities, consider reducing the number of access points</td>
<td>Implement access screening protocol, may include temperature screen (see attached Access Screening Tool)</td>
<td>Management Team in consultation with local health providers</td>
</tr>
</tbody>
</table>

Annex 10 - 10
<table>
<thead>
<tr>
<th>Social Distancing</th>
<th>WHO Phase 3</th>
<th>WHO Phase 4</th>
<th>WHO Phases 5 &amp; 6</th>
<th>Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Implement basic hygiene program for facilities and personnel</strong></td>
<td>Limit number of face-to-face meetings, in favor of teleconferences or web conferences. Where unavoidable, hold meetings in large conference rooms and maintain a distance of three feet.</td>
<td>Stand-down non-essential employees</td>
<td>Management Team in consultation with Safety or Mall Manager</td>
<td></td>
</tr>
<tr>
<td><strong>Postpone non-essential meetings, training, workshops and gatherings</strong></td>
<td>Where feasible, manage shift changes to provide an interval between shifts or shift members to limit contact.</td>
<td></td>
<td>Management Team</td>
<td></td>
</tr>
<tr>
<td><strong>Where possible, arrange for employees to work from home</strong></td>
<td></td>
<td></td>
<td>Management Team in consultation with HR</td>
<td></td>
</tr>
<tr>
<td><strong>Encourage employees to avoid off the job mass gatherings</strong></td>
<td>For large facilities, close facilities where mass gatherings occur – cafeterias, meeting rooms, recreation facilities (?)</td>
<td></td>
<td>Management Team</td>
<td></td>
</tr>
<tr>
<td><strong>Review corporate guidance on travel restrictions to assess if further local measures are needed</strong></td>
<td>Limit non-essential travel; require supervisor approval of travel to avian areas</td>
<td>Ban non-essential travel</td>
<td>Management Team in consultation with Corporate Travel</td>
<td></td>
</tr>
<tr>
<td><strong>Provide workforce guidance on avoiding public transportation</strong></td>
<td></td>
<td></td>
<td>Management Team</td>
<td></td>
</tr>
<tr>
<td><strong>Illness at Work</strong></td>
<td><strong>WHO Phase 3</strong></td>
<td><strong>WHO Phase 4</strong></td>
<td><strong>WHO Phases 4 5 &amp; 6</strong></td>
<td><strong>Responsible</strong></td>
</tr>
<tr>
<td>---------------------</td>
<td>----------------</td>
<td>----------------</td>
<td>-----------------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Provide information on influenza; consider required online educational course (Computer Based Training)</td>
<td>Establish clear communication that employees are not to come to work if they are unwell; consider required online educational course</td>
<td>Same</td>
<td>Management Team in consultation with on site medical staff and Corporate Health Services</td>
<td></td>
</tr>
<tr>
<td>If ill at work, have appropriate person contact employee and screen for influenza vs. common cold. (See attached access screening tool.)</td>
<td>If influenza is suspected, have employee don a surgical mask, if available, to prevent further infection</td>
<td>Same</td>
<td>Management Team in consultation with on site medical staff and Corporate Health Services</td>
<td></td>
</tr>
<tr>
<td>If influenza is suspected, have employee don a surgical mask, if available, to prevent further infection</td>
<td>The suspect case should leave work immediately and seek medical advice; if possible, the employee should avoid use of public transportation</td>
<td>Same</td>
<td>Management Team in consultation with on site medical staff and Corporate Health Services</td>
<td></td>
</tr>
<tr>
<td>The suspect case should leave work immediately and seek medical advice; if possible, the employee should avoid use of public transportation</td>
<td>The infected person’s work station should be disinfected following appropriate hygiene protocols</td>
<td>Same</td>
<td>Management Team in consultation with on site medical staff and Corporate Health Services</td>
<td></td>
</tr>
<tr>
<td>The infected person’s work station should be disinfected following appropriate hygiene protocols</td>
<td>Consider isolation of asymptomatic coworkers contacts for three days</td>
<td>Same</td>
<td>Management Team in consultation with on site medical staff and Corporate Health Services</td>
<td></td>
</tr>
<tr>
<td>Consider isolation of asymptomatic coworkers contacts for three days</td>
<td>For large facilities with on site EHS medical facilities, special provisions may need to be made for quarantine of infected persons</td>
<td>Same</td>
<td>Management Team in consultation with on site medical staff and Corporate Health Services</td>
<td></td>
</tr>
<tr>
<td>If on site EHS services, establish protocol for triaging possible flu-infected employees; and stock N-95 masks for medical personnel</td>
<td>For large facilities with on site EHS medical facilities, special provisions may need to be made for quarantine of infected persons</td>
<td>Same</td>
<td>Management Team in consultation with on site medical staff and Corporate Health Services</td>
<td></td>
</tr>
</tbody>
</table>
Property Entrance Signage

**DO NOT ENTER** this property if you have the following symptoms which might indicate you may have influenza:

- Sudden onset of congestion or trouble breathing AND
- Fever greater than 100.4°F AND
- Cough AND
- One or more of the following: sore throat, joint aches, muscle aches or weakness

These symptoms are indications you may be contagious and should not enter this property until medically evaluated.

Consult a health care provider for guidance.

**SIMON Pandemic/MRSA Event Travel Restrictions**

**Scope:**

Covers the global workforce and its contractors all facilities, worldwide

**Governance**

- Corporate HR shall base alert level on WHO Phase or other appropriate, reliable source and communicate with Corporate Security, Corporate Travel and the Field
- The Field can establish more restrictive travel requirements than the corporation based on local concerns
- Corporate Travel shall have operational responsibility to implement the recommended travel restrictions through the appropriate travel agency
Travel Restrictions

The following are general travel restrictions for each WHO Phase. Corporate HR may recommend additional measures based on actual circumstances.

<table>
<thead>
<tr>
<th>WHO Phase</th>
<th>Travel Restriction</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 &amp; 2</td>
<td>• No Restrictions</td>
</tr>
<tr>
<td>3</td>
<td>• Business unit approval may be required if they have established travel restrictions</td>
</tr>
</tbody>
</table>
| 4         | • Non-essential travel banned to impacted areas  
• Essential travel requires business unit approval prior to travel to impacted areas |
| 5 & 6     | • All travel to influenza impacted areas banned  
• Non-essential travel to non-impacted areas banned  
• Essential travel to non-impacted areas requires business unit approval prior to travel |

Employee Self-Assessment Screening Tool

Access Screening Tool

This screening tool may be used to determine if individuals should be excluded from the workplace due to an influenza-like illness.

Please check the following:

Influenza-like illness in the general population is determined by the presence of symptoms 1, 2 and 3, plus at least one of the symptoms from 4:

1. Sudden onset of respiratory illness AND
2. Fever greater than 100.4 F ** AND
3. Cough AND
4. One or more of the following
   • sore throat
   • joint aches
   • muscle aches or
   • weakness
   ** May not be present in elderly people

Persons with influenza-like illness should remain at home until they have fully recovered.
Persons who have been exposed, within the last three days, to someone with influenza-like illness should stay at home for three days until they are sure they are not ill.

**Fit for Work**
- Recovered from influenza-like illness
- Immunized for longer than two weeks
- On effective antiviral medication
- Asymptomatic

**Unfit for Work**
- Has influenza-like Illness (see Access Screening Tool above)
- Asymptomatic exposed individual for three days
**SIMON Illness Room**

**Why?**: If an onsite room for people feeling ill is provided to employees, it would be expected ill employees will seek rest at the onsite room. Due to the probable contagious nature of the new influenza strain, it will be important to limit exposure of non-infected employees to this pathogen. An isolation room allows minimal non-medical exposure to the uninfected.

**How?**:
- Determine a room with minimal connectivity to the property (minimal amount of connecting doors, windows) near or within the health care facility.
- Place appropriate signage identifying the room in the hallway and on the door of the room.
- Place a ‘registration’ sheet inside the room to record those patients who use it. This may be important if case tracking is needed.
- Employees who present symptoms aligned with the symptoms of Pandemic Flu should be placed in the isolation room as soon as practical.
- Stock the room with minimal furniture, disposable supplies which can be placed in biohazard containers when soiled, hand washing supplies (Appendix A), etc.
- Medical PPE should be stored outside of the room and applied prior to entering the room (e.g. disposable gowns, N-95 masks, splash eye shields and gloves).
- Medical PPE should be discarded in biohazard containers inside the room post patient exam
- After each person leaves the isolation room, the room should be cleaned and disinfected.

**Summary and Notes for Onsite SIMON Illness Room**

Be sure all personnel obtain annual influenza vaccinations.

Ensure all personnel have their pneumococcal vaccinations up-to-date.

Consider methods to protect the common waiting room from those with fever if an avian flu outbreak presents, such as
- Separate triage room for patients with known or suspected exposure
- Complete cleaning of triage room post diagnosis of an infectious disease consistent with avian flu
- Establish protocol to expedite the offsite departure of the diagnosed associate with symptoms consistent with avian flu (e.g. provide surgical mask, discourage use of public transportation, contact personal health care provider)
Determine how and if the field/contractors/visitors should be screened at point of entrance for symptoms if the avian flu pandemic presents. If entry screening occurs, obtain/use ear thermometers to lower contact potential.

Establish a protocol with cleaning services personnel to completely clean all hard surfaces (floors, table tops, phones, door knobs, etc.) during a pandemic episode.

Stock antivirals (e.g. Tamiflu) to provide health personnel prophylactic protection during a pandemic:

- **Recommended dose protocol:**
  a) Tamiflu 75 mg daily for six weeks
  b) Discontinue Tamiflu for two weeks and the health care associate should be away from any anticipated exposure for two weeks (e.g. home leave)
  c) Restart Tamiflu 75 mg daily for six weeks and repeat off cycle.

**Business Continuity Module**

**SIMON and Company Business Continuity Plan Corporate Guidance**

**Purpose**

The purpose of a business continuity plan (BCP) is to ensure on-going operation of essential business activities. The following is general guidance specific to pandemic influenza, plans will be developed by the Field and key support services taking into account the specific circumstances of their operations and location.

**Scope**

This guidance applies to all SIMON facilities and operations. In addition, business continuity planning for a pandemic may have to account for significant impacts to our supply chain, contractors, transportation resources, and essential community services.

Many SIMON businesses and key support functions already have business continuity plans; others are working towards such plans under a schedule determined by their department leaders. The following is supplemental guidance for the pandemic influenza.

**Pandemic Influenza Planning Scenario Assumptions**

- A pandemic may have multiple waves over the period of a year. Each wave should last approximately six weeks, with a peak period of two to four weeks.
- During each pandemic wave, 20-50 percent of workforce may be unable to report to work for two to six weeks. In addition to direct impact of influenza on the workforce, a significant number of workers may stay at home to care...
for ill family members and children whose schools may be closed, or be unwilling to take public transit from fear or not have available transit.

- There is a significant chance of employee mortality with accompanied loss of personnel and experience.
- Supply chain and contractors are likely to be similarly impacted and may not be able to provide services, or only at reduced capacity.
- Essential services – such as Fire and Police – will likely be reduced.
- Medical services will likely be oversubscribed and may not be available.
- Anticipate countries may close borders, severely restrict travel, and may implement controls on importsExports and quarantines.
- Travel restrictions may be applied almost immediately upon documented human transmission in the country, or within days if the influenza is in a nearby country.
- Evacuation plans need to assume an extremely short period of time is available and may require dedicated transportation.
- IT resources could be stressed as more employees attempt to access SIMON systems from home.

Critical Questions
Answers to these questions have to be answered before determining next and future steps.

Home Office
- At what stage do we implement:
  1. hand sanitizer
  2. temperature checks for all employees as they enter the building
- Do we implement social distancing?
- At what point do we make employees start working from home?
- At what point do we close the office?
- At what point do we start reviewing and/or restricting travel?

Remote Locations/Properties
Employees/Contractors
- What health awareness / prevention measures should we take?
- What are the minimum levels of staff needed to keep the property open and what is our plan for back-up:
  1. Management
  2. Operations
3. Security

4. Guest Services

- When do we close the mall?

Tenants

- What health awareness / prevention measures should we take?
- What process do we put in place to ensure we are aware, as much in advance as possible, if a tenant is not going to open?

Customers

- Do we implement hand sanitizer?
- At what point do we close the entire center?
- Is it feasible to implement any type of health check as they enter the door?
- Health Awareness signage?

Recommended Considerations for Business Continuity Planning

The attached “checklist” can be used by Management and property teams to conduct a high level assessment of Business Continuity Planning for pandemic influenza; it includes the following topics:

Governance

- Establish clear lines of authority and decision making

Identification of critical business process and operations, skills, personnel and supplies

- Identify essential operations and those which can be shut down if manpower loss becomes significant (projects, non-essential maintenance, administrative and support functions)
- Evaluate core skills needed to operate critical operations and business functions – identify back-up or cross-trained personnel who can perform these functions
- Evaluate supply chain for business facilities and operations

Planning for Absences

- Estimate 20 – 50% of workforce absent for two to six weeks
- Activate Response Plan (Appendix 2) to provide alternative work locations or work from home to support essential operations

Knowledge Management and Infrastructure Protection

- Ensure critical information and data are backed-up in case of absence or loss of key personnel
Where possible, provide redundancy and independence of storage of critical information in case access to facilities and locations becomes restricted

Make sure IT can support the developed plans

**Communications**

- Have pre-identified communication channels regarding business continuity, including Government notifications and potential shut down of business sectors, with:
  - Workforce
  - Other Affiliates/Sites and supply chain segments
  - Activated Crisis Management Team(s)
  - Key customers and suppliers
  - Key contractors
  - Relevant Governmental Agencies
  - Community leaders and shareholders, as appropriate
  - Corporation – for support and resources

**Human Resource Issues**

- Emigrant employees
- Pay and benefit considerations
- Contractors
- Access to company facilities and tracking employees

**Additional Resources**

- Link to the Center for Disease Control checklist for BCP
- Link to the WHO Global Influenza Preparedness Plan
Pandemic Influenza Checklist: Business Continuity Plan (BCP)

Component Planned Action Assigned

Governance

Clear lines of authority and decision making

- Who has responsibility to activate the BCP, and is there a backup in case of absence?
- Is proper delegation of authority in place to make BCP decisions, and succession if needed due to absences?
- Are criteria and authorities in place for deciding to shut down some, or all, operations or business functions?

Identification of critical operations, skills, personnel and supplies

“Critical”: safety, security, compliance and operations material to the business

- Have critical operations and business functions been identified? (safety systems, power, control rooms, keep production on-line, supply customers, pay bills)
- Are there any “single point of failure” scenarios where loss of key personnel due to absence could severely impact the business?
- Identify core skills needed to operate essential operations and business functions. Can these be backfilled due to absence?
- Can business continue if key “shared” infrastructure is significantly reduced or shut down? (Communications, IT, accounts payable, procurement)
- Could supply chain interruption and absences of suppliers lead to a shutdown? What is the critical path component and timing?
- Evaluate critical supplies (food, water, paper goods).

Planning for Absences

Estimate 20 –50% workforce absence for 2-6 weeks

- Evaluate critical workforce size and skills needed to keep essential functions operating. (Control Room Operators, Fire Department, etc). Identify trigger levels for shutdown.
- Is the lead time needed for safe reduction or shutdown of activities/operations understood and factored into shutdown criteria?
- Evaluate if critical functions can be conducted from alternate locations or outsourced, or whether work practices can be modified to minimize number of personnel.
- Are appropriate measures in place to limit spread of the virus in the workplace, assess health care systems and provide medical support?
Knowledge Management

Critical information is backed-up and available

- Are critical data, files, and information systems backed-up in case of loss of key personnel?
- Is critical information available from alternate locations if property access is restricted?

Communications

*Timely and accurate information can be communicated*

- Have key contacts with shareholders been established to communicate BCP actions, including reduction or shutdown?
- Include employees, customers, labor unions, suppliers, Government.
- Is Government or contractual notifications required for BCP actions, including suspension of operations and disruption of supply?
- Ensure critical employees have remote access to IT systems

Human Resource Issues

The following issues may need to be considered and counsel provided by Human Resources:

- Identify and review Human Resource issues which may be raised in the planning for prevention and response to pandemic influenza. The local Human Resources Manager can work with local Affiliates/Sites and departments to conduct the review and recommend solutions. As appropriate, corporate HR guidance will be available. Policy decisions need to consider in-country laws and regulations, and application within joint ventures.

Outcomes for the review could include:

- Current policies are sufficient;
- Some policy decisions need to be made case-by-case as actual issues become known;
- Some policies or guidance are needed in advance.

The following HR issues are examples of what should be considered when planning for prevention or response.

Emigrant Employees

- The approach to voluntary travel back to home country which may be requested by the employee or the employee’s dependent
- Travel back to home country authorized by SIMON
- Mandatory travel to home country required by SIMON
Pay and Benefit Considerations

- Pay during forced stand down of non-essential operations and employees, such as forced vacation, furlough, disability leave and other leave scenarios.
- Policy or guidance on SIMON mandating employees to stay at home if they are ill, and/or if they have ill family members, including the potentially contagious period. Consider using fitness for duty policies.
- Policy or guidance for employee sick leave to care for sick family members (similar to the U.S. California AB 109, which is the only current policy).
- Telecommute or other work from home policies, like the telecommute guidance in U.S.; IT connectivity issues – “how to” must be planned ahead.
- Prescription medication(s) covered, and purchase amount limitations allowed by benefit plans, may need to be evaluated.

Contractors

Review local requirements.

Access to company facilities and tracking employees

- Policy or guidance on barring entry to company facilities to employees, contractors and visitors.
- This may be based on temperature screening, or limiting contact within the work place.
- Policy or guidance on tracking employee whereabouts, using local systems such as emergency contact lists or a common telephone number to call.
- Guidance for “stranded” travelers unable to return due to travel restrictions (treat as continuation of business trip, needs, communication mechanism).
<table>
<thead>
<tr>
<th>Action</th>
<th>Target Date of Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Pandemic Influenza Advisory Team</strong> - Assist the Corporate Crisis Management Committee and the Field in preparing and responding to pandemic influenza. Corporate HR and Corporate Emergency Response will lead the team.</td>
<td></td>
</tr>
<tr>
<td><strong>Corporate Communications</strong> - Maintain a pandemic influenza website, develop key corporate messages, provide timely updates and alerts, and provide Affiliates/Sites with communications tools.</td>
<td></td>
</tr>
<tr>
<td><strong>Environmental Health and Safety</strong> - Implement hygiene programs at company-owned facilities worldwide. This will include appropriate signage, personal hygiene supplies and hygiene of shared surfaces and common areas.</td>
<td></td>
</tr>
<tr>
<td><strong>Global Procurement</strong> – Assess key supplier’s preparedness and business continuity readiness for pandemic influenza. Procurement will work with suppliers to close significant identified gaps.</td>
<td></td>
</tr>
<tr>
<td><strong>Corporate Business Continuity Plan</strong> – Advisory Team to develop a high-level business continuity plan to support the Corporate Crisis Management Committee.</td>
<td></td>
</tr>
<tr>
<td><strong>Affiliates/Sites Actions - HIGHLY RECOMMENDED</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Prevention</strong> - Deploy educational activities to all employees.</td>
<td></td>
</tr>
<tr>
<td><strong>Response</strong></td>
<td></td>
</tr>
<tr>
<td>• Conduct medical readiness assessments at SIMON-operated facilities.</td>
<td></td>
</tr>
<tr>
<td>• Utilize corporate guidance to develop a plan to respond and contain the spread of the virus.</td>
<td></td>
</tr>
<tr>
<td><strong>Business Continuity</strong> - Update Business Continuity Plan based on pandemic influenza phases.</td>
<td></td>
</tr>
<tr>
<td><strong>Communications Planning</strong> -</td>
<td></td>
</tr>
<tr>
<td>Governance</td>
<td>WHO Phases 1 &amp; 2</td>
</tr>
<tr>
<td>------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Corporation</td>
<td>Monitor</td>
</tr>
<tr>
<td>Business Units</td>
<td>Monitor</td>
</tr>
<tr>
<td>Prevention</td>
<td>Implement seasonal influenza education</td>
</tr>
<tr>
<td></td>
<td>No action</td>
</tr>
<tr>
<td>Response - Spread of Virus</td>
<td>Develop BCP tools, guidance and multi-tenant site plans, currently underway</td>
</tr>
<tr>
<td>Business Planning (BCP)</td>
<td>Develop BCP, per OE Expectation 11.4 according to BU risk and priority</td>
</tr>
<tr>
<td>Communications</td>
<td>Deploy seasonal influenza communications</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Annex 10 - 25
Communication Module

Pandemic Communication Plan for Affiliates/Sites

Creating and maintaining consistent and coordinated communications will be most important to prevent the spread of influenza, as well as to prepare for a possible pandemic. Although an overall corporate communication plan is in place, the following steps and templates were developed to help you build a local communication plan. Timing of communications may vary depending upon local status of a pandemic. Assistance is available to help you and additional communication tools and templates will be provided.

Considerations

When communicating with employees, think about their frame of mind and the effect your communications may have. Employees may be concerned about their own health or that of friends and family; they may be anxious about the unknown; or they may be concerned about misinformation they are hearing. Whatever the situation is, you can help them by providing accurate and timely information to help them focus on what they need to do. Identify a communication contact or team which will be responsible for developing and maintaining the communication plan and creating communications for your business. Your local Policy, Government and Public Affairs representative and your local Human Resources Manager should be a part of the planning process. Keep in mind, depending upon the World Health Organization (WHO) pandemic phase, you will need both internal and external communication strategies.

Preliminary Steps to Develop a Communication Plan

1. Identify your audiences and your shareholders - Determine who you will need to communicate with and if any audiences need advance communications. For example, there may be instances where you want to advise supervisors about upcoming communications (or possibly give them additional information) so they are prepared for questions from employees.

2. Determine the best way to reach your audiences. You may want to consider:

   a. **Face-to-face meetings** – Depending upon the level of response needed, consider including influenza messages or updates in town hall meetings or meetings especially created to discuss prevention and response. Provide presentation materials to leadership teams.

   b. **Posters or flyers** – If posters or flyers are an effective way to communicate in your location, identify the types needed, where to post them and who will be responsible to replace them as needed.

   c. **Email** – Create appropriate distribution lists for various audiences such as Management Teams, all Employees, Contractors, Clinics, etc.
d. **Newslines and Phone Trees** – If your location has a newsline or emergency number, find out who is responsible for updating it, what the process is to update the message and how to communicate the phone number to employees. This will help you reach supervisors or employees at home with specific messages.

e. **Web** – Point employees to the influenza website for prevention and education awareness. Determine if additional local information is needed on the web to keep employees updated at home or at work concerning local responses to a potential pandemic (HR can assist).

f. **Central Support Team** – Consider identifying and setting up a central team expert in prevention, response, business continuity and communications for your work location to address the various issues employees will have. This group could also serve as a referral service for employees seeking community service.

3. List the challenges you may face when communicating with employees and contractors. For example, are employees working different shifts; are employees focused on personal issues; if you can’t reach employees, do you have emergency contact information?

4. Identify key overarching messages. Key messages may include:
   a. SIMON is taking an active role in preparing for a potential avian flu pandemic to minimize health risks to the workforce, their families and the communities where we live and operate.
   b. The company will strive to prevent the spread of this virus and respond quickly and appropriately should the risk elevate to a level which affects local, regional or pandemic populations.
   c. We are aligned with WHO and other experts in the field of infectious diseases to ensure our communications and response efforts are accurate, credible and effective.
   d. We will take measures to minimize disruption to our business operations in the event of an outbreak.

5. Gain Management support and agreement on the communication approach, key messages and timing.

6. Identify a cost center for communications.

7. To ensure business unit alignment with the corporate communication strategy, follow the template in the communications section of the pandemic plan and seek advice from the Influenza Advisory Team as necessary. This will drive global consistency in the communications internally and externally.
8. Determine who will review and approve communications. It is suggested all communications be approved by the same person or persons to ensure consistency and avoid conflicting messages.

**Summary Template – Example**

Use this template to document the information obtained from the steps above for use in the Communication Plan template below.

| Audiences                  | • Leadership Team  
|                           | • First line supervisors  
|                           | • All employees and families  
|                           | • Contractors  
|                           | • Health care providers  
|                           | • Community  
|                           | • Government / non-Government agencies  
| Communication Methods     | • Posters  
|                           | • Email  
|                           | • Newsline  
|                           | • Web  
|                           | • Meetings  
| Challenges                | Shift work  
| Key Messages               |  
| Budget                     |  
| Timing                     |  
| Reviewers and Approvers   |  

Annex 10 - 28
**Communication Plan Template – Example**

Use this template to plan and track your communications by WHO phase. This is only an example of how to use the template. You should tailor this to meet your specific needs.

- **WHO Phase 3**: Human infection(s) with a new subtype, but no human-to-human spread, or at most rare instances of spread to a close contact.
- **WHO Phase 4**: Small cluster(s) with limited human-to-human transmission but spread is highly localized, suggesting the virus is not well adapted to humans.

<table>
<thead>
<tr>
<th>Audience</th>
<th>Message</th>
<th>Method</th>
<th>Who is Responsible</th>
<th>Status</th>
</tr>
</thead>
</table>
| Leadership   | • We are taking a proactive approach and will be developing a strategy based on prevention, response and business continuity.  
               • Please provide resources as needed. | Meeting      | Managing Director                   |        |
| Employees    | Appendix 1 Influenza Education - What is influenza and what can you do to protect yourself and others.  
               • You are invited to attend an information session to learn more.  
               • Here is the influenza website for more information about preventing the spread of influenza.  
               Consider including family and contractors. | E mail       | Management Team in consultation with Corporate Regional Medical Manager |        |
| Employees    | Protect yourself and others  
               • We are developing a strategy based on prevention, response, business continuity and communications.  
               • Should there be a pandemic, you will be notified and provided further instructions through the company newsline. | Meeting with presentation | Medical providers and others |        |
<table>
<thead>
<tr>
<th>Expatriate Employees</th>
<th>Communicate evacuation logistics and timing.</th>
<th>E mail</th>
<th>Management Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employees and Contractor s</td>
<td>Be prepared by stocking critical items at home.</td>
<td>Poster</td>
<td>Environmental safety and others</td>
</tr>
<tr>
<td>Employees and Contractor s</td>
<td>Keeping your hands clean is one of the most important steps you can take to avoid getting sick and spreading germs.</td>
<td>Poster</td>
<td>Environmental safety and others</td>
</tr>
<tr>
<td>Employees and Contractor s</td>
<td>Contain your coughs</td>
<td>Poster</td>
<td>Environmental safety and others</td>
</tr>
</tbody>
</table>
Appendix A

Alcohol-Based Hand Sanitization

Product Specifications
These products are widely available consumer goods. It is recommended the product contain at least 60% ethyl alcohol by weight (CDC). Brand names in the United States include Purell® (GOJO Industries http://www.gojo.com/purell/). GOJO Industries is a global company and can make products available in Europe, Latin America and Asia.

Dispensers
The types of dispensers available vary widely. Local procurement can work with distributors to suit individual site or departmental needs. The key objective here is to encourage hand sanitization. Facilities should take a liberal posture with regard to distribution (more rather than less dispensers and containers). This is because SIMON wants to encourage use of sanitizers immediately after events such as nose blowing, coughing or sneezing.

Examples of dispensers include:
- Desk stations
- Wall-mounted stations
- Free-Standing stations
- Personal use containers

Dispensers should, at a minimum, be located in:
- Restrooms
- Meeting/conference rooms
- Cafeterias
- Break rooms
- Other locations where employees congregate (e.g., building atria or receiving lobbies)
- Mobile employees should carry personal-sized containers

Expiration Dates
Alcohol-based hand sanitizers do not last indefinitely. Pay strict attention to expiration dates stamped on bottles or other labels indicating dates.

Method of Use
- Alcohol based hand sanitizers are most effective if hands are NOT visibly dirty prior to use
- Apply product to the palm of one hand
- Rub hands together
Rub the product over all surfaces of hands and fingers until hands are dry

Appendix B
Frequently Asked Questions

What is human Influenza?
- Influenza, or the “flu,” is a highly contagious viral infection of the respiratory tract
- It is not the “stomach flu” which causes stomach upset or diarrhea

What is Avian Influenza “bird flu”?
- Avian influenza “bird flu” is a contagious disease caused by avian influenza viruses which normally infect mostly birds – especially domestic chickens, ducks and turkeys
- The current virus already has an ability to go from birds to humans
- The virus might adapt over time to infect and spread from human to human, with the potential to cause a pandemic

What is swine flu?
- Swine influenza (also called pig influenza, swine flu, hog flu and pig flu) is an infection by any one of several types of swine influenza virus
- Swine influenza virus (SIV) or S-OIV (swine-origin influenza virus) is any strain of the influenza family of viruses which is endemic in pigs
- As of 2009, the known SIV strains include influenza C and the subtypes of influenza A known as H1N1, H1N2, H3N1, H3N2, and H2N3

What is MRSA?
- MRSA stands for “methicillin-resistant Staphylococcus aureus”
- MRSA is a kind of Staphylococcus aureus (“staph”) bacteria, which is resistant to some kinds of antibiotics

What is Staphylococcus aureus?
- Staphylococcus aureus, often referred to as “staph,” are bacteria commonly carried on the skin or in the nose of healthy people.
- About 25-30% of the U.S. population carries staph on their bodies and yet the bacteria do not always cause illness or infection.

What kinds of infections do some people get from staph?
- Staph can cause many kinds of skin infections, like pimples, boils, and rashes. These infections often contain pus, and may feel itchy or warm. They may be swollen or red
- Occasionally, staph cause more serious infections such as surgical wound infections, bloodstream infections, and pneumonia
What is a pandemic and who will be affected?

- A disease outbreak occurring over a very wide area, crossing international boundaries and usually affecting a large number of people
- We have had three pandemics since 1900 and many scientists believe it is only a matter of time until the next influenza pandemic occurs
- All segments of society will be affected by a pandemic influenza, either through being ill, taking care of someone who is ill, or having to carry a greater responsibility at work or home

How is the influenza virus spread?

- Direct spread is from person-to-person from respiratory droplets of coughs and sneezes
- Indirect spread is when a person touches an object contaminated with virus (door handle, keyboard) and then eats or touches their eyes, mouth or nose before washing their hands
- The virus can live for up to two days on hard surfaces (door knobs, toys, telephones)

How long is the influenza virus infectious/contagious?

- A person with the flu is contagious 24 hours before they become sick and for three to five days after becoming sick
- Some children may be contagious for longer than a week

Common cold versus influenza

- In general, flu symptoms are more severe than cold symptoms
- The flu usually starts very suddenly with a high fever, chills, body aches and tiredness

Is a vaccine available?

- There is not a proven effective vaccine should the current strain of avian influenza (H5N1) become a human virus
- Once the pandemic influenza strain is identified, it will take six to nine months to produce the vaccine
- Therefore, a vaccine may not be available during the first one or two outbreaks of the pandemic

Treatment and Supply Availability

- In a pandemic, most businesses and health care facilities will be impacted
  - Medical care/supplies will be harder to obtain
  - Home supplies will be harder to obtain
• Medication (Tamiflu) to potentially treat influenza is currently in short supply and may not be readily available in your area. It is not yet known for sure if this medication will be effective.
• Antibiotics to treat secondary infections, such as pneumonia, may also be in short supply.

Personal Health Practices
• Eat, rest, drink plenty of fluids and exercise in moderation.
• Wash your hands frequently with warm water and soap.
• Cover your nose and mouth with a tissue when coughing or sneezing.
• Minimize visitors to your home.
• Check up on friends and family who live alone.
• Get the current influenza vaccination, if available.

Staying Healthy at Work during a Pandemic
• Work from home or arrange for flex hours when possible.
• Wash your hands frequently with warm water and soap, or use waterless sanitizing gel to clean hands (Appendix A).
• Cancel non-essential meetings; consider telephone conferences instead.
• If you feel unwell, stay home and contact your health care provider as needed; monitor your health, rest and drink plenty of fluids.

Hard Surface Hygiene at Home and Work
• Use a disinfecting wipe to clean surfaces of common areas such as door handles, phones, keyboards or tools.
• Wash your hands prior to touching your face or eating.

Social Distancing at Home and Work
• Social distancing refers to methods to reduce the frequency and closeness of contact between people.
• Generally, social distancing refers to mass gatherings of people, but the same methods can be applied to the home setting.
• When around people who are coughing or sneezing, keep your distance by at least 3 feet.
• Avoid meeting people face-to-face; use the telephone or have web conferences.
• Avoid any unnecessary travel.
• Avoid crowded places.
• Avoid public transportation.
• Avoid crowded restaurants.

Annex 10 - 34
• Stock up on basic items to minimize exposure to public places.
• Shop at smaller stores, with smaller lines and fewer people.
• Shop during off hours to avoid large crowds.
• Arrange to pay bills by mail, online or over the phone.
• Cancel or postpone family gatherings, outings or trips.
• If you cannot avoid crowds, minimize the amount of time you spend around people.

Personal Hygiene
• Cover your mouth and nose with a tissue if you are coughing or sneezing.
• If you don’t have a tissue, use your sleeve - not your hand.
• Put your used tissues in the trash.
• After coughing or sneezing, wash your hands.

Monitor your Health
• Monitor your health if you are traveling to, or are working in, areas affected by the avian flu.
• The onset of fever is an important symptom of influenza.

Taking your Temperature
• Use a reliable digital thermometer. Alternatively, use a mercury thermometer (not recommended for travel).
• Take your temperature orally. Wait 10 minutes after eating, drinking, brushing your teeth or smoking.
• Normal temperatures range from 96.4F to 99.5F.
• Temperatures of 99.7F to 100.4F suggest a low grade fever and should be checked every 4 hours.
• Readings above 100.4F indicate a fever and medical advice should be sought.

What to do if you have Influenza
• Call your health care provider and follow recommendations.
• Do not report to work until you are medically cleared and without symptoms.
• Depending on your symptoms, you may be advised to stay at home on home isolation.
• Call your supervisor if you are ill and unable to work.
Home Isolation

- A person may be placed on isolation if they have an infectious illness such as influenza.
- Isolation means staying at home, not going to work, school or other public places, and not meeting with people.
- While at home, the person who is sick should stay isolated or away from other members of the household as much as possible.

How Long Should Home Isolation Last?

- The flu is contagious for 24 hours before symptoms start and for about three to five days after symptoms start. Home isolation usually lasts for seven days or until symptoms have completely cleared.
- Healthy household members should remain on home isolation as well until at least three days after the symptoms of the ill member goes away.

Preventing the Spread of Infection While Under Home Isolation

- The ill member should stay in one room with the door closed to be separated from other healthy household members.
- Good hygiene, such as covering the mouth when coughing and cleaning hard surfaces is recommended.
- Visitors to the house should be discouraged.
- The ill should have separate towels, dishes and other personal items

Family Safety

- Household members should stay away from the isolated ill member
- If direct contact is necessary with the ill member, remain three feet away from direct contact
- Healthy household members should remain on house isolation until at least three days after the symptoms of the ill member have resolved