



INTERNATIONAL
MARKET CENTERS

**TOGETHER SAFELY
REOPENING PLAN**

JUNE 4, 2020

Statement from Bob Maricich, Chief Executive Officer, International Market Centers

At International Market Centers (IMC), we care deeply about our team of employees, our customers, the industries we serve and our communities. The COVID-19 pandemic is unprecedented in its scale and the challenges it presents to our industry. This document is designed to address these challenges, and determine the appropriate path and timing to reopening our business, with the health and safety of this collective community in mind.

From the outset, we established teams to monitor the situation, respond quickly and act appropriately, adhering to the advice of governments and local authorities. We quickly established a cross-departmental task force to develop guidelines for a phased approach to reopening our business. We enlisted the guidance of a world-renowned epidemiologist, Carlos del Rio MD, to guide our thinking and evaluate our new safety protocols. Dr. del Rio is the Hubert Professor and Chair of the Department of Global Health and Professor of Epidemiology at the Rollins School of Public Health and Professor of Medicine in the Division of Infectious Diseases at Emory University School of Medicine in Atlanta.

Through the work of this task force, we developed the attached guidelines and requirements for our phased approach to reopening our business. This plan presents what we will do to keep our guests, employees, and our community safe. Each operating department has its own customized set of procedures, even more detailed than the summary presented here. It relies on the best available science on sanitization methods guided by the CDC and local governments. We will continue to refine and update the plan as we and experts learn more.

We believe that we all have an obligation to do our part to contain the spread of this virus while returning to business, so we will enforce our defined protocols in an effort to do that.

We hope to see you soon at our markets and we will continue to refine our protocols, as needed, to ensure that everyone can work productively in a safe environment.

Thank you,

A handwritten signature in black ink that reads "Robert Maricich". The signature is written in a cursive, flowing style.

Bob Maricich
CEO International Market Centers

INTRODUCTION

In the coming months, as shelter-in-place orders, closure mandates, and other governmental restrictions continue to ease, IMC needs to be prepared to welcome back its staff, its tenants, its vendors, buyers, designers and other visitors. For this to happen we need to be prepared to provide for them an environment where all reasonable steps have been taken to minimize the risk of transmission of COVID-19 from one individual to another. To this end, IMC has continually monitored guidance issued by the World Health Organization (WHO), the Centers for Disease Control and Prevention (CDC), industry groups, and others. We have reviewed the reopening plans of some of the key players in the office, retail, hospitality, and gaming sectors to discern what constitutes best practices, have consulted with relevant suppliers and service contractors, and have tracked both mandates and recommendations of federal agencies as well as state, and local governments for the jurisdictions in which IMC operates. In addition, IMC has engaged an Emory University-based infectious diseases physician and epidemiologist who is a recognized expert to consult in the preparation and implementation of a reopening program. Finally, IMC has tapped subject-matter experts on its own staff to form a cross-functional task force to coordinate the requisite research and analysis, and to produce a set of protocols to guide the process of reopening our facilities to our staff and to our various customer segments. Our goal is to adopt a standard of care that meets or exceeds the requirements of all relevant governmental authorities, as well as the best practices of our industry for facilities of the type owned and operated by IMC.

These protocols represent a compilation of the many sources and authorities consulted as of the date hereof. Recent history has shown not only how little we know about the risks posed by COVID-19, but how rapidly the science is advancing in our understanding transmission as well as prevention of infection and guidance is updated frequently so measures to deal with those risks can change. To minimize the risk to the health of our tenants, staff, and visitors, these protocols, and any subsequently devised for the IMC workforce, will be re-evaluated on an ongoing basis, taking into account the best practices of the business community and the guidance of the CDC and other governmental and quasi-governmental bodies. Developments in the containment, spread, and impact of COVID-19 may require the adoption of additional procedures, the refinement of these protocols, or even the re-imposition of a partial or total facility closure at a future date. Similarly, as the threat of the pandemic recedes, as vaccines are developed and made available, and as treatments are identified, the necessity for some of the measures described in these protocols may change. Accordingly, IMC's protocols should be viewed as a living document, to be revisited, reviewed, and revised on an ongoing basis. IMC reserves the right to determine, in its sole discretion, whether the trend in the rate of local or regional infections or the

capacity of the hospitals and other medical facilities serving the city where each campus is located warrant a pull-back from the reopening and the imposition of additional restrictions.

TIMING OF REOPENING:

The precise timing for opening our facilities to the public, to employees, to events, and to Markets will depend both on what is allowable in the relevant jurisdiction and on our ability to provide all visitors to our campuses with a safe environment in which to transact business. Consistent with the best advice from governmental, industry and other sources, IMC plans a phased reopening over a period of months. The protocols for each step are provided in detail, below, but at a very general level, the phases of reopening are identified as follows:

Phase 1: Pre-opening Preparations. During this phase, IMC will be securing supplies of Personal Protective Equipment (PPE), making alterations to the physical facilities, recalling additional essential personnel to augment those who have been on-site during the shutdown, training staff and vendors in the new guidelines and requirements, and beginning to implement a communication plan conveying these requirements to our staff, our tenants, our vendors and our customers.

Phase 2: Reopening to Daily Business. During this phase, members of the public will again be permitted to enter the facilities and the customers of those tenants who are either required to or choose to be open for non-Market buying will be accommodated.

Phase 3: Recalling Employees. IMC contemplates that much of its workforce will continue to work remotely until such time as the resumption of Markets and events, or the level of other activity at the facilities requires their presence on-site. During this phase, IMC will continue to support its remote workforce, will evaluate on a continuous basis its on-site staffing needs, will recall staff as and when indicated, and will provide appropriate training, guidance, and support measures to all returning employees.

Phase 4: Resumption of Markets and Events. As the current restrictions on gathering size and population density begin to ease, and as we reimagine our Markets to comply with whatever limitations are then being imposed in each jurisdiction, we anticipate beginning to welcome larger numbers of visitors to our facilities. During this phase, IMC will implement a set of protocols designed to handle the larger crowds and the increased movement of freight without sacrificing the need to screen entrants, maintain necessary physical distancing and facility hygiene, and provide adequate protective equipment for staff and vendors.

PHASE 1: PRE-OPENING PREPARATIONS

1. **Legal and Compliance.** The Legal Department has assigned personnel to monitor executive orders and other governmental directives in the states in which we operate, and to provide current guidance to senior management as to what is permitted in each state. In addition, the Legal staff is monitoring, analyzing and disseminating guidance on recommended and prohibited policies and practices issued by the CDC, the Occupational Safety and Health Administration (OSHA), the Equal Employment Opportunity Commission (EEOC), the White House, and other recognized governmental and quasi-governmental sources. IMC has also retained the services of Dr. Carlos Del Rio, Professor of Medicine in Infectious Diseases at Emory University School of Medicine and Professor of Global Health and Epidemiology at Emory University's Rollins School of Public Health, and an internationally recognized authority on infectious diseases. Dr. Del Rio is advising IMC on the development and implementation of these protocols. Finally, the Legal Department is developing appropriate waivers for use as described more fully in these protocols.

2. **Preparing the Facilities.** In preparation for opening our campuses to the relevant members of the public, the following measures are being taken:

- a. Shields. IMC has sourced the appropriate materials and is manufacturing Lexan shields to protect employees staffing positions with the most direct contact with tenants and visitors. Some of these shields are intended to be installed at the points of most frequent contact, such as service desks and other transaction points. Others will be portable and can be set temporarily as the need is identified.
- b. Signage. Appropriate signage will be strategically placed through the facilities, both in the common areas and in IMC's offices, reminding tenants, employees and visitors of the requirements of these protocols. In addition, signage will be posted promoting the availability and advisability of hand sanitizer, the advisability of avoiding touching one's face, the proper way to wash hands, and the proper way to wear, handle, and dispose of masks. Our video walls and monitors throughout the campus will be enlisted to reinforce these messages.
- c. Installation of thermal imaging equipment. At present, IMC is evaluating the efficacy of a variety of thermal detection technologies. We anticipate that more than one technology will be employed in concert. Some of these contemplate the installation of equipment at key points in our facilities. Such equipment may or may not be procured and installed prior to Phase 2's reintroduction of buyers and designers to the campuses but is part of the long-range plan for monitoring entrants.
- d. Establish routes of ingress and egress with appropriate queuing space and the installation of necessary barriers. In order to control access to the multi-tenant buildings, it will be

necessary to limit the number of points of ingress and egress and adopt measures to channel visitors to their destinations. IMC is evaluating and will deploy appropriate signage and barriers to manage the necessary access control.

- e. Establish temporary quarantine and screening facilities. We will identify and designate appropriate space, proximate to entry points and to IMC's own offices, where individuals who display symptoms of COVID-19 can be privately sequestered for further evaluation and, where necessary, pending transportation to a medical facility.
- f. Deploy hand sanitization stations. IMC will identify appropriate locations near entrances, in elevator lobbies, near food service facilities, and other high-traffic areas for the deployment of hand sanitizer dispensers.
- g. Hand washing stations. Preliminary evaluation suggests that there are locations about the campuses where sinks are not readily accessible to employees and visitors and where additional hand washing stations should be deployed. IMC is evaluating the options available to meet this need.
- h. Restrooms. IMC will minimize the need for disinfecting restrooms and controlling density by strategically closing certain seldom-used restrooms to tenants and staff during non-Market times, consistent with relevant code requirements. Many restrooms throughout our properties are already equipped with hands-free flushers, hands-free sinks, and hands-free paper towel dispensers. IMC is evaluating the possibility of replacing some or all of the older fixtures with newer, hands-free equipment. Some hot air hand driers are still in use but will be decommissioned as quickly as paper towel dispensers can be deployed to replace them.
- i. HVAC. IMC is initiating a program to increase the frequency with which filters are replaced in air handling units throughout the properties. Where feasible, IMC will also increase the introduction of fresh air into the properties, increasing the frequency of air exchanges where existing equipment permits. IMC's Facilities teams are also evaluating whether the existing equipment can be retrofitted with HEPA filtration and/or UV sterilization devices.

3. **Institution of Protective Measures - Tenants.** Tenants have had access to their showrooms throughout the closure. Access has been provided through Security, and while IMC endorsed governmental directives regarding physical distancing and the recommended use of PPE, IMC did not impose additional requirements during the period the facility was closed to the public. In preparation for admitting buyers and designers to the facilities, effective upon the adoption of these protocols, IMC is taking the following additional steps to minimize, to the extent reasonably possible, the risk of contagion to personnel on or about IMC properties:

- a. Screening. Points of entry will continue to be limited. IMC will conduct non-invasive temperature checks on all persons entering a multi-tenant building utilizing a combination of thermal imaging equipment and temporal thermometers. Anyone identified with a temperature of over 100.4° F will be offered the option of leaving the facility or being taken to a private area for a secondary screening. Tenants confirmed to have a temperature over 100.4° F will not be allowed entry to the property and will be directed to appropriate medical care in accordance with the screening protocols attached hereto as **Appendix A**.
- b. Personal Protective Equipment. Appropriate masks or face shields of a type approved by the CDC must be properly worn by tenants and their employees at all times while in or about the common areas of the facilities – including, but not limited to, loading docks, lobbies, corridors, elevators, escalators, restrooms, meeting rooms, and food service areas – and when they enter the showroom of another tenant or a retail space. Masks are more effective than face shields alone, but face shields may be worn by individuals who have a medical reason not to wear a mask. Face shields, if worn, must cover the face fully from forehead to below the wearer’s chin and wrap around the sides of the wearers face. During this phase, tenants will be encouraged, but not required to wear masks or face shields within their own showrooms. Masks may be reusable, fabric masks or three-ply disposable masks. N95 respirators and similar masks are acceptable as they provide additional protection to both the wearer and to those around the wearer, but they are not required. IMC has secured a supply of disposable masks and will, at least initially, be prepared to provide a mask to tenants who arrive without one. Masks will be issued at screened points of entry. Tenants will not be required to wear gloves.
- c. Physical Distancing. Our goal is to meet or exceed health authority guidelines on proper physical distancing at all points in and about the facilities. Tenants will be required to practice proper physical distancing in all common areas of the facilities and to observe governmental restrictions on the maximum occupancy of their showrooms. Tenants will also be encouraged to practice proper physical distancing within their showrooms. At this time, proper physical distancing means remaining at all times at least six (6) feet away from other individuals who are not members of a party that arrived together. Required distancing may not be possible in elevators, but elevator capacities will be strictly limited to a number consistent with the size of the elevator. The capacity will be prominently marked in and/or adjacent to each elevator. In addition, maximum capacities for each restroom, breakroom or other communal facility will be determined and posted on or near the entrance to such facility. These capacities are mandatory, not advisory, and must be strictly observed.
- d. Hygiene. Tenants will be requested to wash their hands thoroughly (for at least twenty seconds with soap and warm water) frequently throughout the day and, at a minimum, promptly after using the restroom, coughing, sneezing, touching the face, blowing the nose, cleaning, smoking, eating, or drinking, or having contact with high-touch areas such

as door handles, elevator buttons and handrails. In addition, tenants are requested to cover their mouth and nose with a tissue or an upper sleeve (not their hands) when they cough or sneeze, to deposit any used tissue in a waste basket, and to wash their hands promptly and thoroughly with soap and water. Tenants will be encouraged to make use of hand sanitizer when hand washing is not practical. IMC has secured a supply of hand sanitizer and on an interim basis, will provide it upon request to tenants who do not have their own. Tenants will eventually be required to provide their own.

4. **Institution of Protective Measures – Employees.** Throughout the closure, IMC has maintained a minimal staff on-premises to maintain and secure the buildings, to provide support to tenants who chose to avail themselves of the use of their showrooms, to supervise housekeeping, to cover our switchboard, mailroom, and other essential services, and to maintain the IT systems necessary for the continuation of the business and to enable most of the staff to work remotely, all in accordance with executive orders issued by governors of the relevant states. It is our intention, as noted more fully below, to have most of our employees continue to work remotely as long as the needs of the business permit and our evolving understanding of COVID-19 suggests is prudent. However, in preparation for admitting buyers and designers to the facilities, it will be necessary to increase somewhat the size of the on-premises staff. Accordingly, to best protect its workforce and to minimize the risk of infection, effective upon the adoption of these protocols, IMC will take the following additional steps:

- a. Screening. Employees will be required to enter the facilities only through designated entry points. Employees are also required to monitor themselves on an on-going basis for symptoms of COVID-19 using one of the many on-line tracking tools such as The Emory Coronavirus Checker (<https://c19check.com>), and will be asked to confirm daily upon arrival at a property that they are not experiencing such symptoms. IMC will conduct noninvasive temperature checks on all arriving employees utilizing a combination of thermal imaging equipment, kiosks, and temporal thermometers. Any employee identified with a temperature over 100.4° F will be required to participate in a secondary screening with a further temperature check and relevant health questions. IMC may, as needed, do a similar temperature check of any employee at any time during the working day if IMC has reason to suspect the individual is symptomatic. Employees confirmed to have a temperature over 100.4° F or who report other COVID-like symptoms will not be permitted to enter (or to remain in) the offices. A private, dedicated computer will be made available to the employee to seek the immediate advice of a telehealth physician if he or she wishes. The employee may prefer instead to go home and speak with a telehealth physician or the employee's own physician, but the employee must consult a physician before returning to an IMC property. Screening practices and procedures for employees both upon entry and throughout the working day, as well as procedures for directing symptomatic individuals to appropriate medical care, will be substantially in accordance with the screening protocols attached hereto as **Appendix A.**

b. Personal Protective Equipment.

- **Masks and Face Shields.** Appropriate masks or face shields of a type approved by the CDC must be properly worn by IMC employees while on or about the property. Without limiting the preceding sentence, masks or face shields must be worn while in all common areas, within the offices of IMC, within a tenant's showroom (irrespective of the tenant's policies for its showroom), and in all food service locations and retail spaces. Masks must at all times cover the nose and mouth of the wearer. Initially, masks may be reusable fabric masks or three-ply disposable masks. IMC has a supply of disposable masks that it will provide on an interim basis to on-site personnel. IMC may subsequently issue to each employee washable fabric masks imprinted with the IMC logo. Once supplied, employees are requested to wear these masks instead of the disposable masks in order to assist customers in identifying mask-wearing individuals as IMC staff. Masks are more effective than face shields alone and are preferred, but for those employees who find masks uncomfortable or ill-suited to their duties due to the environment in which they work, face shields are an acceptable alternative. Face shields, if worn, must cover the face fully from forehead to below the wearer's chin and wrap around the sides of the wearers face. IMC is sourcing appropriate face shields and will provide one to any employee requesting one. Employees bear the responsibility for keeping their reusable masks and/or face shields clean and presentable. Masks designed to protect the wearer may be required for some employees whose duties bring them into contact with individuals suspected of having the virus. Employees may remove their masks or face shields while alone within their own offices or cubicles (provided the walls of the office or cubicle are at least above head height while seated) but are encouraged not to do so in order to minimize the risk of contamination of office surfaces. Even in private offices or cubicles, masks or faces shields must be worn when others are present.
- **Gloves.** We have also secured a supply of gloves of a type approved by the CDC. While most employees will not be expected to wear gloves while discharging their normal duties, gloves will be provided to, and must be worn when appropriate by some employees whose responsibilities (i) require them to handle the property of others, sanitation of which is not under IMC control, (ii) require them to have contact with individuals suspected of having the COVID-19 virus, or (iii) put them in direct and frequent contact with visitors to the properties (such as temperature screeners and security officers). Because improper use of gloves can create a higher risk of contamination than not using them at all, appropriate training will be provided for such employees.
- **Eye Protection.** IMC employees having close contact with individuals suspected of having the COVID-19 virus will also be required to wear eye protection in

conjunction with a mask. IMC will provide these employees with face shields, goggles or other eye protection in compliance with CDC recommendations. Protective eyewear is not required of IMC personnel in other situations but recognizing that some staff may feel more comfortable with the additional protection, IMC will provide such eyewear to its employees upon request.

- c. **Physical Distancing.** Employees of IMC and our contractors will be required to practice proper physical distancing at all times while on or about the properties. At this time, proper physical distancing means remaining at all times **at least** six (6) feet away from other individuals who are not cohabiting. All employees should at all times observe the distancing markers installed in public areas, in elevators and on escalators. Acknowledging that recommended distancing may not be possible in elevators, elevator capacities will be strictly limited to a number consistent with the size of the elevator, and the capacity will be prominently marked in or adjacent to each elevator. Maximum capacities for each restroom, breakroom or other communal facility will be determined and posted on or near the entrance to such facility. Posted capacities are mandatory, not merely advisory, and must be strictly observed.
- d. **Hygiene.** IMC Employees will be required to wash their hands thoroughly with soap for at least twenty seconds frequently throughout the day and, at a minimum, promptly after any of the following activities: using the restroom, coughing, sneezing, touching the face, blowing the nose, cleaning, smoking, eating, drinking, and before and after handling shared office equipment. In addition, employees must cover their mouth and nose with a tissue or an upper sleeve (not their hands) when they cough or sneeze, to deposit any used tissue in a waste basket, and to wash their hands promptly with soap and water. Where this is not practical, and to supplement regular hand washing, all IMC staff will be required to make appropriate use of hand sanitizer. IMC staff will be furnished with a supply of hand sanitizer for this purpose and will also be encouraged to make frequent use of the hand sanitizer stations located strategically throughout each campus when their duties take them out of their immediate work locations.
- e. **Tools and Equipment.** In addition to the housekeeping protocols discussed below, each employee is responsible for taking all necessary and proper measures to keep copiers, printers, fax machines, shared computers, and other office equipment properly cleaned and disinfected. Hand sanitizer and/or disinfecting wipes will be provided in close proximity to all such shared equipment. Employees must sanitize their hands before and after using the equipment or must thoroughly sanitize all touch points on the equipment before each use. In addition, steps should be taken to avoid sharing office tools that previously were routinely shared, such as writing utensils, staplers, hole punches, phones, etc. When sharing is necessary, employees are to clean and disinfect the equipment with provided disinfecting wipes and/or use hand sanitizer before and after such equipment changes hands. Engineers, mechanics, freight handlers, and other facilities personnel will

be required to sanitize all shared tools at the beginning and end of each shift, and whenever the tool or equipment changes hands. Employees using GEM cars and other company vehicles, ladders, scissor lifts, forklifts, pallet jacks, and floats are responsible for ensuring that the touch points on such equipment are appropriately cleaned and sanitized before and after use.

5. **Institution of Protective Measures – Vendor Personnel.** Just as with IMC’s own staff, our key vendors – notably security, housekeeping and food service – have had a minimal staff on-site continually or periodically throughout the closure. It will be necessary to increase the size of their on-premises staff as we approach opening the facilities to buyers and designers. To minimize the risk of infection, IMC will review the policies, procedures, and guidelines of the vendor companies, will direct them to abide by the recommendations of the CDC and other health authorities, the best practices of their respective industries, the requirements of any other governmental or quasi-governmental body applicable to their activities. IMC will require them to take, at a minimum, the following measures:

- a. Screening. Contractor’s personnel will be asked to enter the facilities only through designated entry points. IMC will conduct noninvasive temperature checks on all contractor staff entering the properties utilizing a combination of thermal imaging equipment, kiosks, and temporal thermometers. Any contractor’s employee identified with a temperature over 100.4° F will be required to leave the facility. IMC may, as needed, do a similar temperature check of any employee or contractor’s employee at any time during the working day if IMC has reason to suspect the individual is symptomatic. Screening practices and procedures will be in accordance with the screening protocols attached hereto as **Appendix A.**
- b. Personal Protective Equipment. Contractors are responsible for supplying their employees with the requisite PPE and for providing mandatory training for them in its proper use and disposal. At a minimum, this PPE will include:
 - Masks and face shields. Masks or face shields of a type approved by the CDC must be properly worn by all employees of IMC’s vendors at all times while on or about the property. Without limiting the preceding sentence, masks or face shields must be worn while in all common areas, within the offices of IMC or the on-site office of a vendor, within a tenant’s showroom (irrespective of the tenant’s policies for its showroom) and in all food service locations and retail spaces. Masks must at all times cover the nose and mouth of the wearer and may be of the reusable fabric variety or three-ply disposable masks. Masks are more effective than face shields alone and are preferred, but for those employees who find masks uncomfortable or ill-suited to their duties due to the environment in which they work, face shields are an acceptable alternative. Face shields, if worn, must cover the face fully from forehead to below the wearer’s chin and wrap around the sides of the wearers face.

- Gloves. Gloves of an approved type must be worn by contractors' personnel as and when recommended or required by federal, state and local authority and as their specific duties require. Food service employees must wear gloves in accordance with applicable law, codes, and the best practices of their industry. Housekeeping personnel must wear appropriate gloves at all times while performing their duties on or about the properties. Contractors are required to train their employees in the proper use, removal and disposal of gloves.
 - Eye Protection. Generally, IMC will not require that eye protection be worn by contractors' employees except in circumstances where their duties bring them into close contact with individuals suspected of having the COVID-19 virus.
- c. Physical Distancing. Employees of IMC's vendors will be required to practice proper physical distancing at all times while on or about the properties. All such personnel should at all times observe the distancing markers installed in public areas, in elevators and on escalators. Because recommended distancing may not be possible in elevators, elevator capacities will be strictly limited to a number consistent with the size of the elevator, and the capacity will be prominently marked in or adjacent to each elevator. Maximum capacities for each restroom, breakroom or other communal facility will be determined and posted on or near the entrance to such facility. These capacities are mandatory, not advisory, and must be strictly observed.
- d. Hygiene. Contractors' employees must be required to wash their hands thoroughly with soap for at least twenty (20) seconds as frequently as feasible, and at a minimum, promptly after using the restroom, coughing, sneezing, touching the face, blowing the nose, cleaning, smoking, eating, or drinking. In addition, such employees are requested to cover their mouth and nose with a tissue or an upper sleeve (not their hands) when they cough or sneeze, to deposit any used tissue in a waste basket, and to wash their hands promptly with soap and water. Where this is not practical, and to supplement regular hand washing, vendor personnel will be required to carry and make appropriate use of hand sanitizer. Contractors' staff are also encouraged to make frequent use of the hand sanitizer stations located strategically throughout each campus.
- e. Tools and Equipment. Contractors' employees must be directed to take proper measures to keep the equipment they utilize in performing their duties properly sanitized consistent with CDC guidelines, state and local mandates, and the best practices of their industries.
6. **Institution of Protective Measures – Freight.** Freight has continued to move into and out of the buildings throughout the closure. The pace of that activity is expected to increase as we approach reopening the properties to buyers and designers. Steps will be taken to minimize the

risk of introduction of COVID-19 into our properties through the receipt, handling and delivery of tenants' freight or of bulk supplies procured by IMC. These measures may include:

- a. Use of gloves and other PPE by freight handlers.
- b. Requirement that all tenant freight must be palletized, shrink-wrapped or crated to minimize the need for individual handling.
- c. Frequent cleaning and disinfection of handles and other touch points on freight-moving equipment;
- d. Staggering dock appointments to minimize tenant-to-tenant contact.
- e. Require, on an interim basis, that IMC personnel move all freight, suspending temporarily the practice of lending equipment to tenants. Similarly, IMC personnel would have exclusive control of the freight elevators to prevent tenants from trying to move their own freight, to maintain elevator occupancy in keeping with physical distancing protocols, and to ensure that freight elevators do not become an access point to the building, bypassing screening procedures.

7. **Housekeeping**. In early March 2020, IMC took steps to enhance its housekeeping measures in response to the COVID-19 threat. These enhancements to the cleaning specifications stress frequent, meticulous cleaning of the campuses, with particular emphasis on the utilization of EPA List N chemicals or products for the cleaning and disinfection of the high-touch points of the facilities, including:

- Door handles
- Stair handrails
- Elevator buttons
- Escalator handrails
- Light switches
- Countertops
- Faucets
- Coffee makers and microwaves
- Vending machines
- Computer keyboards and mice

To ensure that proper physical distancing is observed, housekeeping personnel will not be permitted to clean personal workspaces while the employee is in the workspace. Employees are asked, where feasible, to exit the workspace long enough for housekeeping personnel to perform their duties. Where doing so is not feasible, employees may place their trash cans outside of their

workspace prior to the arrival of housekeeping personnel, but the employee will then be responsible for cleaning and disinfecting the high-touch points of his or her workspace.

A summary of IMC's enhanced cleaning protocols is attached as **Appendix B**. These protocols will be reviewed on an ongoing basis and will be adjusted and augmented as necessary to remain in compliance with national guidance and industry best practices.

8. **Additional Human Resource Policies**. Effective upon the adoption of these protocols, employees will be required to understand and adhere to the following additional policies:

- a. Notification of possible exposure. Each employee must notify the Human Resource Department promptly if he or she believes that he or she may have been exposed to someone who either tested positive for COVID-19 or is reasonably believed to have COVID-19. The employee may be asked to cooperate with a representative of the Human Resource Department in identifying those individuals with whom he or she has been in contact on or about the properties so that IMC can inform those individuals of a possible exposure. Absent mitigating circumstances, an employee who has reason to believe he or she was exposed to someone with the virus will not be able to return to the property until the expiration of a fourteen-day home quarantine.
- b. Confirmed cases of COVID-19. Each employee who has tested positive for COVID-19 must notify Human Resources immediately. Such employee will not under any circumstances return to any IMC property without the express permission of the Human Resource Department. The employee's workspace and personal office equipment will immediately be quarantined to other employees until the workspace and all equipment and tools therein have been cleaned and disinfected by a specialized contractor trained and equipped for such enhanced cleaning. In addition, the employee will be required to cooperate with a representative of the Human Resource Department in identifying those individuals with whom he or she has been in contact on or about the properties so that IMC can inform those individuals of a possible exposure. The employee who tests positive will have the option to allow his or her name to be disclosed to the individuals with whom he or she has come in contact. Without the employee's express consent, his or her identity will be kept confidential.
- c. Return to work. Any employee who has tested positive for COVID-19 will not be allowed back onto an IMC property until he or she has been away from the office until one of the following circumstances:
 - If the employee is symptomatic, the later to occur of (i) ten (10) days following the first date of symptoms, or (ii) the employee has experienced at least seventy-two (72) continuous hours with no COVID-19 symptoms (without use of fever suppression medications);

- If the employee is symptomatic, the later to occur of (i) two (2) consecutive negative PCR tests, taken at least twenty-four (24) hours apart, and (ii) no fever (without the use of fever suppression medications);
 - If non-symptomatic, but merely tested positive, ten (10) days from the date of the last positive test; or
 - If non-symptomatic, but merely tested positive, after two (2) consecutive negative PCR tests, taken at least twenty-four (24) hours apart,
- d. **Mandatory training.** All employees will be required to complete training videos through IMC University on the proper use of PPE and other relevant topics. Certain personnel, including those in Security, Human Resources, and Legal, will be required to complete training on proper and lawful approaches to dealing with individuals on or about the properties, or attempting to enter a property, who are believed to present a risk of contagion.
- e. **Limiting visitors policy.** All employees are asked to limit visitors to the facility, including friends, family members, business associates, and vendors. Except in extraordinary circumstances, all such visits or meetings should be conducted by telephone, teleconference, or videoconference.
- f. **Travel policy.** IMC will adhere to CDC guidelines on travel restrictions. Until further notice, IMC will permit only essential business travel approved by the Executive Leadership Team (ELT). Instead, IMC will affirmatively promote teleconferences and videoconferences as alternatives, and will provide appropriate tools and training to employees requiring them. Employees required to travel on business will be furnished with masks of a type intended to protect the wearer for use on aircraft or other public conveyances, and will be required to wear them at all times onboard and in areas of the airport or terminal where physical distancing is not feasible, except while eating or drinking. Personal travel is permitted, but employees must report all such travel in advance to Human Resources, advising IMC of the destination(s), duration, and means of travel. IMC may require returning employees to self-quarantine for up to fourteen (14) days prior to returning to the office.

9. **Communications.** Critical to the successful deployment and adoption of the above-described policies and procedures is the effective and timely communication of these policies to the relevant audiences. Tenants, staff and vendors all need to know what's expected of them and what behaviors will be expected and, in some cases, required. To this end, IMC has been in regular contact with customers, market attendees, media, and employees throughout the pandemic to provide information and updates on the evolving pandemic (including details related to the three states in which we operate), government and IMC relief programs, current state of our business (including market postponements and cancellations), new digital opportunities offered in the

wake of market hiatus, and other pertinent information. The current communications plan includes:

- a. **Tenants and Exhibitors** An email communication has been sent a minimum of once weekly to provide status updates on campus closures, market postponements and cancellations, IMC rent relief and exhibitor discount programs, new digital opportunities and guidance on government relief programs. We have also deployed videos from CEO Bob Maricich to communicate significant updates as we have seen great engagement on this form of message delivery. There has also been considerable one-to-one outreach by our leasing, marketing and digital teams throughout this period.
 - b. **Market Attendees:** Emails to our market buyers deploy every week to two weeks depending where we are in a market cycle, so content related to COVID-19, new digital opportunities, etc. have been imbedded in this communication plan. All major announcements have also been posted on our social channels for broader reach. In addition, our Buyer Services and Call Center teams have been reaching out to tenants and buyers to answer questions, gauge COVID-19 impact on their business and gauge sentiment around timing for return of markets this summer.
 - c. **Media:** In addition to our regular cadence of press releases about market-related changes, including moving rich content to digital formats in the near term, we have also deployed media announcements about any major changes to market schedules.
 - d. **Employees:** IMC Human Resources Department has deployed continuous communication to employees about status of stay-at-home orders, changes to benefits, new digital learning opportunities, etc. All customer communications are sent to all employees, so they are aware of the information being shared with tenants. The marketing team developed a talking points/FAQ document to share with select employees who are likely to be in direct contact with customers, so we can ensure consistent messaging across the organization on key topics related to the pandemic. We have also organized digital all-staff meetings, to replace previous face-to-face meetings for CEO Bob Maricich and other ELT members to share business updates and address questions from the team. A new email address was established, so employees can ask questions of management at any time with anonymity.
10. **Soft Opening.** During the remainder of Phase 1, IMC will permit tenants in the Atlanta Decorative Arts Center (ADAC), the Las Vegas Design Center (LVDC), and the open-daily floors of AmericasMart to begin to see their customers on a limited basis by appointment only. An appointment will consist of a maximum of two (2) customers shopping together per showroom representative, and each customer or pair of customers must be escorted to and from the showroom by the showroom representative. Tenants must contact IMC to advise of each appointment, and their customers will be admitted to the building by Security in the same manner that tenants now gain access. Customers will have their temperatures checked prior to entry, a

waiver must be signed by each customer, and approved masks will be mandatory while in any common area of the property.

PHASE 2: REOPENING TO DAILY BUSINESS

All of the measures implemented during Phase 1 will remain fully in effect during Phase 2. Many will need to be scaled up to reflect the increased traffic in the buildings. With increased buyer and designer traffic, however, certain additional steps will need to be taken. Further, the increased activity on each campus will require IMC to recall more of its staff. The principle areas of focus during this phase will be as follows:

1. Institution of Protective Measures – Buyers and Designers.

- a. Screening. Points of entry will continue to be limited. The protocols applicable to tenants will be applicable to the admission of buyers and designers. IMC will conduct non-contact temperature checks on all persons entering a multi-tenant building. Anyone identified with a temperature over 100.4° F will be offered the option of leaving the facility or being taken to a private area for a secondary screening. Visitors confirmed to have a temperature over 100.4° F will not be allowed entry to the property and will be directed to appropriate medical care in accordance with the screening protocols attached hereto as **Appendix A**.
- b. Personal Protective Equipment. Appropriate masks or face shields of a type approved by the CDC must be properly worn by visitors at all times while in or about the buildings, without exception. Masks must at all times cover the nose and mouth of the wearer and may be of the reusable, fabric variety or three-ply disposable masks. Masks are more effective than face shields alone, but face shields may be worn by individuals who have a medical reason not to wear a mask. Face shields, if worn, must cover the face fully from forehead to below the wearer’s chin and wrap around the sides of the wearers face. IMC will supply each entrant who does not have his or her own PPE with a disposable mask, hand sanitizer, and a one-page explanatory piece communicating the requirements of access to the property. At the point of screening, Security personnel will also provide visitors with a verbal summary of the distancing and PPE and hygiene requirements.
- c. Physical Distancing. Visitors will be required to practice proper physical distancing in all common areas of the facilities, and in the showrooms they visit. At this time, proper physical distancing means remaining at all times at least six (6) feet away from other individuals who are not members of a party that arrived together. Required distancing may not be possible in elevators, but elevator capacities will be strictly limited to a number consistent with the size of the elevator. The capacity will be prominently marked in and/or adjacent to each elevator. In addition, maximum capacities for each restroom, breakroom or other communal facility will be determined and posted on or near the entrance to such

facility. Visitors will be advised in writing that these capacities are mandatory, not advisory, and must be strictly observed.

- d. Hygiene. Visitors will be requested to wash their hands thoroughly with soap for at least twenty (20) seconds frequently throughout the day and, at a minimum, promptly after using the restroom, coughing, sneezing, touching the face, blowing the nose, cleaning, smoking, eating, or drinking. In addition, visitors will be requested to cover their mouth and nose with a tissue or an upper sleeve (not their hands) when they cough or sneeze, to deposit any used tissue in a waste basket, and to wash their hands promptly with soap and water. Visitors will also be encouraged make use of hand sanitizer when washing is not practical.

2. **Campus Modifications.**

- a. Traffic control. IMC will proactively monitor the traffic throughout the campuses and will evaluate the flow of people through the properties warrants additional steps, such as designating separate entrance and exit locations, implementing expanded queue lines, or instituting one-way traffic patterns in some corridors.
- b. Workstation modification. As most employees will still be working remotely, at least initially during Phase 2, we anticipate the need for modifications to our offices will be slight. However, as more employees begin to return to working on-site, IMC will take such steps as may be necessary to facilitate physical distancing between employees while in their work environment. This may include such steps as installing Lexan barriers between adjacent workspaces, reassigning employees to alternating workstations, or the temporary conversion of conference rooms, meeting spaces or breakrooms to employee workspaces. The Human Resources Department will work with each departmental head to identify where these issues occur and to collaborate on solutions.

3. **Additional Human Resource Policies.**

- a. Essential employees. Human Resources will work with each department head or other functional team leader to identify which employees are required on-site in order to provide both tenants and visitors with the best possible service, when each employee's presence is required on-site, and what the business justification is for necessitating that employee's presence on-site.
- b. Employee schedules. Human Resources will also work with these managers to explore where office occupancy can be minimized through flexible time schedules, rotating shifts, continued work part time from remote locations, and other similar measures.

- c. Employee adjustment to returning. We are developing programs for employees who have been partially or completely idled during the closure or who have been working remotely, to facilitate a smooth transition back into a full-time office environment. These programs may include scheduling adjustments to accommodate employees' child or elder care needs, employer-provided parking for individuals concerned about the safety of public transportation, and promotion of IMC's Employee Assistance Plan, which can provide valuable resources to the employees, including medical, legal and financial consultation. Particular care will be taken in accommodating those individuals who are in a group identified by the CDC as being at a higher risk for serious illness.
4. **Registration.** During the closure, anyone entering IMC facilities did so by signing in with Security, which recorded the identity of the individual and the destination within the campus. The reopening of the campuses to buyers and designers will require a resumption of Registration personnel to greet the visitors, verify their registration, and to answer questions about the new building policies,
- a. Preregistration. To minimize queueing at registration stations, all buyer and designer attendees must pre-register online. A visitor who has not pre-registered will be asked to step out of the queue and complete the registration process on a mobile device. Visitors who preregistered but are on the "Pending" list will be issued a one-time courtesy pass, consistent with pre-closure policies.
 - b. Registration stations. Lexan barriers will be provided at all registration stations and there will be no physical contact between staff and visitors. The floor in the queueing area will be marked with guidelines to indicate appropriate distancing between individuals. Masks or face shields will be required for all registration staff at all times while on duty, and staff will be supplied with hand sanitizer at their workstations. Adequate breaks will be allowed for frequent hand washing. Self-serve registration kiosks will be deployed as was the practice pre-closure and will be frequently cleaned and disinfected.
 - c. Consumer attendees. Members of the public wishing access to AmericasMart Building 3 will follow standard pre-closure policies, including showing a photo ID to registration personnel through the Lexan barrier.
 - d. Badges. Adhesive-backed badges will be printed for approved visitors. After verifying by photo ID that the badge matches the individual requesting it, the badge will be placed on the counter by a gloved registration staffer. Badges should not be handed person-to-person, and there should be no direct contact between registration staff and visitors. Visitors must wear their badges in a visible location at all times while on the property.
5. **Communications.** Timely communication of our rules and our expectations will be even more critical during Phase 2 to ensure the successful deployment and adoption of the above-

described policies and procedures. Buyers, designers, tenants, staff and vendors all need to know before arriving at our campuses what our rules are and what behaviors will be expected and, in some cases, required of them. The marketing department's communication plan during this phase contemplates the following:

- a. Customer (tenants): We will continue to use our weekly emails to communicate with tenants about policies and protocols related to open for daily business as well as any updates related to market postponements and cancellations, new digital opportunities to enhance their daily business as we prepare for Summer Markets. We will continue to use one-to-one outreach through our leasing, marketing and digital teams to ensure key messages are reaching our customers.
- b. Market Attendees: Upon reopening an IMC campus for daily business, we will send an email to buyers to inform them of the reopening and provide new guidelines for visiting our campus and any protocols they must adhere to. Announcements will also be posted on our social channels for broader reach.
- c. Media: A media announcement will be issued to trade and local media to announce the reopening of an IMC campus.
- d. Employees: IMC Human Resources Department will share the tenant communication with all team members to keep them informed of what is being sent to our customers. IMC Talking Points/FAQ document will be updated to reflect changes to campus operations and answers to anticipated customer and buyer questions. HR will communicate any changes to the employee work from home practices. Employees can continue to ask questions of management at any time through the established email address with anonymity.

PHASE 3: RECALLING EMPLOYEES

As noted above, the process of recalling employees who have been working remotely has already begun and will continue through Phases 1 and 2. It is our belief, however, that a significant portion of our staff can and should continue to work remotely until their physical presence on-site is required by the nature of their duties and the needs of the business. It is not our intention, however, to have a remote workforce on a permanent basis. We recognize that our customers deserve and expect personal contact with not only the front-line staff, but with a wide variety of employees in both front- and back-of-house positions. Moreover, IMC's corporate culture is one that stresses collaboration, cooperation, and fellowship among coworkers. It is our expectation, therefore, that over the weeks and months following our reopening to buyers and designers, there will be an incremental recall of employees to return to the properties in preparation for Phase 4 when we will again be able to host events and to resume producing and promoting Markets.

All of the measures implemented during Phases 1 and 2 will remain fully in effect during Phase 3. Some may need to be scaled up as a result of the larger staff on-site. Accordingly, the principle areas of focus during this phase will be as follows:

1. Additional Human Resource Policies.

- a. Hallways and other gathering spots. Employees will be instructed not to congregate in hallways, lobbies, restrooms, conference rooms, break rooms, or other areas that lend themselves to gathering. Physical distancing must be observed at all times, as well as any density restrictions imposed by governmental order or by CDC guidance.
- b. Kitchens and breakrooms. IMC will monitor and will adhere to CDC and other guidance on best practices for office kitchenettes and breakrooms. Until such guidance is provided, our kitchenettes and breakrooms will be subject to occupancy restrictions conspicuously posted in each such room. Team Members will be asked not to congregate in these areas and to continue to maintain physical distancing and wear masks at all times in these areas, except while eating or drinking. Any food brought on premises by employees should, if feasible, be in a container that does not need to be kept in a refrigerator. Shared equipment such as coffee machines, vending machines, water coolers, ice machines, microwaves and refrigerators may be used, but employees are required to wash their hands thoroughly or use provided hand sanitizer before and after touching any such equipment. Although breakrooms should not be used for communal meals, those employees who do not have a private workstation, such as facilities staff and shipping and receiving personnel, will be able to utilize break areas as long as physical distancing requirements are observed.
- c. FMLA and related policies. Currently, IMC has a more generous paid leave policy than is required by CARES (although CARES does not apply to IMC due to the number of employees). The Human Resources Department will work with the Legal Department to ensure that our policies regarding time off for child-care, elder-care, and for mental or physical illness remain in full compliance with all applicable federal, state and local laws.
- d. Ongoing adjustments to policies. Human Resources will administer regular employee surveys to assist us in understanding which measures are working, which need to be reevaluated and revised, and where employees are experiencing challenges in connection with their return to the new workplace.
- e. Employee wellness. We are hearing from many employees that working from home and the enforced quarantine that has resulted from the pandemic have negatively affected the employees' diet and exercise habits. IMC will be providing a variety of wellness programs, which may include securing and disseminating wellness information and diet and exercise tips, and wellness challenges to encourage staff to resume healthier habits. IMC will also provide resources to assist with employees' psychological wellness through

its Employee Assistance Plan for individuals experiencing difficulty in transitioning back to the office environment after working from home.

- f. Virtual events. As many conventional employee activities and events are not available during the period of restrictions on physical distance, event density and so forth, Human Resources will devise and implement a variety of “virtual events” to engage employees and begin to restore esprit de corps among the staff.

2. **Communications.** Timely communication of these rules and our expectations to our employees will be necessary to ensure the successful deployment, acceptance and adoption of these policies and procedures. The Human Resources Department will communicate our staggered return to work plan. Human Resources will work with each department to plan the phased-in return of essential employees and diverse work schedules to ensure the continuance of physical distancing. Employees can continue to ask questions of management at any time through the established email address with anonymity.

PHASE 4: RESUMPTION OF MARKETS AND EVENTS

At the present time, the jurisdictions in which IMC operates continue to impose, to varying degrees, restrictions on events and large gatherings and the operation of retail stores and restaurants. In addition, restrictions on air travel, reduced availability of hotel rooms and residual concern about the safety of flying, ground transportation, lodging and dining severely impact our ability to resume producing and hosting Markets, meetings, conferences, trade shows, and other events. Certainly, our own events will need to be re-thought in their entirety and will likely look very different from what our customers are accustomed to experiencing.

1. **Analysis and Preliminary Steps.** We have surveyed both our exhibitor and attendee populations to understand better what would best accommodate their respective needs and concerns, and the results of that survey will factor heavily into our planning, but without knowing what will be permitted by governmental authority (and when), by the ability of the transportation and hospitality industries to make physical attendance at Markets and other events practical and safe, and by the willingness of buyers, sellers and other event attendees to participate, it is difficult to establish at this point a set of protocols for how we will accommodate the challenges inherent in producing or hosting even scaled back Markets or events. Without knowing more about what we will be doing, it is premature to memorialize how we will do it.

2. **Projected Measures.** That said, there are certain requirements that are immutable; the need for physical distancing (and for traffic-control measures to accommodate the need for distancing), for consistent use of PPE, and for increased hygiene of both individuals and the facilities. Beyond that, our Logistics, Facilities, Tradeshow Operations and Event Operations departments have done extensive analysis of the foreseeable issues resulting from bringing larger

numbers of people together and have begun devising some recommended steps to consider. These steps will likely include:

- Requiring that registration for a Market be done exclusively online;
- Encouraging third-party event planners to utilize online registration only;
- Establishing maximum daily attendance requirements to enhance our ability to control crowds and traffic flow;
- Modifying Market duration with attendees preselecting which dates they will attend;
- Staggered arrival and departure times;
- Restrict building access entry points to manage screening process and admittance;
- Personnel stationed at high-traffic areas for additional crowd control and enforcement of distancing protocols;
- Review of policies and procedures for non-COVID-19 medical emergencies, lost and found, courtesy transportation and other customer service programs that involve close physical space;
- Push notifications throughout the day reminding attendees to wear PPE, wash hands, distance, and use sanitizer;
- Engage freight elevators to augment the passenger elevators to allow for more distancing;
- Eliminate self-service food and beverage options and coffee service;
- Food service program administered solely by contracted national providers with offerings organized around pre-wrapped, “grab-and-go” options;
- Restrict off-site catering providers to control food quality and presentation;
- Meeting and seminar room layouts incorporate physical distancing requirements;
- Temporarily restrict on-site events and gatherings and focus on virtual opportunities;
- Adequate queueing space, properly marked, for coat and baggage check;
- Turn off all drinking fountains;
- Eliminate self-serve bins for bottled water in favor of hand distribution by a properly masked and gloved staffer;
- Limit use of linens for room sets in favor of hard surfaces that can be more easily and frequently sanitized;
- Increased use of hard-wall booths and reduce use of aisle carpeting to facilitate cleaning and sanitizing;
- Customized booth configurations and floor plan layouts to accommodate physical distancing and density of traffic;
- Adequate queueing space for scooter rental services with appropriate procedures for sanitizing rental scooters provided to guests;
- Secure additional parking garages and surface lots to accommodate increased drive-in traffic; and
- Require physical distancing and mandatory use of PPE on shuttle busses, use of hand sanitizers when boarding and disembarking, and enhanced measures to ensure that busses are frequently and properly cleaned and sanitized.

3. **Communications**. IMC is preparing to communicate new protocols and policies as we plan for hosting our upcoming scheduled Summer Markets. It will be important that both customers (tenants) and visitors understand the precautions being taken and policies and expectations prior to arriving at any IMC campus/market.

- a. Customer (tenants): We will continue to use our weekly emails to communicate with tenants about policies and protocols related to upcoming markets as well as new digital opportunities to connect with buyers prior to, during and after markets. Because of the successful engagement we have seen in deploying videos with IMC's CEO Bob Maricich, we used this medium to announce changes to our Summer Market schedule. We will continue to use one-to-one outreach through our leasing, marketing and digital teams to ensure key messages are reaching our customers.
- b. Market Attendees: Emails to our market buyers deploy every week to two weeks depending where we are in a market cycle, so we will use those emails to announce new summer Market dates, new policies and protocols that will be in place for those markets, and other pertinent information. We will also use social media to expand our reach of these messages. Our Buyer Services and Call Center teams will relaunch their market outreach to assist buyers with market planning, explain safety mitigates and precautions being taken for health and safety, and answer any questions they may have.
- c. Media: A media announcement will be issued to trade and local media to announce new summer Market schedule.
- d. Employees: IMC Human Resources Department will share the tenant communication with all team members to keep them informed of what is being sent to our customers. IMC Talking Points/FAQ document will be updated to reflect changes to campus operations and answers to anticipated customer and buyer questions. HR will communicate any changes to the employee work from home practices. Employees can continue to ask questions of management at any time through the established email address with anonymity.

MONITORING COMPLIANCE

One of the inherent challenges of implementing a program such as that described in these protocols is the difficulty of monitoring compliance with the requirements and enforcing the rules. Despite the reality that all of the rules and guidelines are for the protection of the tenants, staff and visitors to our facilities, we are well aware of the resistance of many to taking appropriate steps to protect one's own health and that of those individuals with whom one comes in contact. We do not anticipate, therefore, that these protocols will be universally embraced or honored voluntarily. It will be necessary on an ongoing basis to monitor the degree to which all stake

holders are adhering to the requirements set forth above. Much of the responsibility for this will be assumed by our Security Department through their own staff and contract security personnel. Given the size of the campuses, it will likely be necessary to increase the size of the security force in the near-term to implement and enforce what for many of our customers will be unwelcome and inconvenient measures. The responsibility for monitoring compliance will not, however, rest solely with Security. All IMC employees will also be asked to report non-compliance on the part of tenants, contractors or visitors. A dedicated phone line and email address will be set up for this purpose. Security will monitor those mailboxes for reports of conduct needing follow-up.

IMC believes the best means of maximizing cooperation is to adopt and communicate clearly a policy of not making exceptions to the guidelines for anyone. Therefore, the following steps will be taken:

- Employees of tenants not observing the requirements of these protocols will first receive a warning. If they continue not to be in compliance, they will be required to leave the property and will not be allowed to return without the express consent of a member of the Executive Leadership Team. Repeated refusal to abide by the rules may result in a default of the lease and the exercise of IMC's remedies up to and including termination of the lease.
- Customers of tenants, and other visitors to the facility, who do not observe the requirements of these protocols will also first receive a warning. If they are subsequently observed not to be in compliance, they will be required to leave the property and will not be allowed to return without the express consent of a member of the ELT.
- Contractor personnel who do not observe the requirements of these protocols will be reported to the contractor in question for appropriate action. If the same individual is subsequently observed not to be in compliance, he or she will be required to leave the property and the contractor will not be permitted to bring that individual back on property.
- IMC employees who do not comply with the requirements of these protocols will first receive a warning. If they continue not to be in compliance, they will be sent home and will not be allowed to return to work without the express consent of the employee's supervisor. In addition, the employee will be subject to disciplinary action which may include formal censure, suspension without pay or in extreme cases, termination of employment.

We cannot eliminate entirely the risk that a tenant, employee or visitor will come into contact with the Coronavirus, or someone who is asymptomatic but is infectious despite the measures outlined above. However, proper and consistent implementation of these protocols by everyone at our facilities will make IMC's campuses as safe as can reasonably be achieved, and safer than many other public environments that our stakeholders will encounter.

APPENDIX A

TEMPERATURE SCREENING & CASE REPORTING PROTOCOLS

Initial Screening. We will attempt to screen all entrants to the properties through a combination of thermal imaging, kiosks, and hand-held temporal thermometers. Any non-employee registering a temperature above 100.4° F will be discreetly offered a secondary screening, and if the secondary screening is declined, will be denied admittance to the property. Any employee registering a temperature above 100.4° F will be required to undergo a secondary screening.

Secondary Screening. The individual displaying an elevated temperature will be escorted to a designated, private and isolated area. A properly trained and qualified individual using appropriate PPE and a temporal thermometer will take a second temperature and ask follow-up questions about other symptoms.

Employees and Visitors with Elevated Temperature. If the secondary reading confirms that the individual has a temperature above 100.4° F, the individual will be denied entry to the property and will be encouraged to seek immediate medical care. Employees will be required to contact a telehealth physician for an immediate consultation.

Transportation. If the individual registering the fever, or a member of that individual's party, has a private vehicle available, the individual may leave in that vehicle. If the individual with the fever or a member of that individual's party does not have a private vehicle available, IMC will summon an ambulance to transport the individual to proper medical care. Under no circumstances should IMC endorse – and staff should take lawful steps to discourage – an individual with an elevated fever leaving the property on public transportation.

Internal reporting. Security will prepare an incident report containing, at a minimum, the name and contact information of the affected individual, the fact that the temperature was elevated beyond permissible guidelines, and whether the visitor was transported for medical care. IMC will not retain any identifiable health information regarding the individual other than the fact that the person's temperature exceeded guidelines.

APPENDIX B

ENHANCED CLEANING & DISINFECTING PROTOCOLS

Cleaning Products. Housekeeping efforts will include cleaning and disinfecting products and protocols that conform to EPA List N applications approved for use and effective against the virus that causes COVID-19. IMC's third-party cleaning vendors are to ensure staff is adequately trained on application of these cleaning products and that the supply chain to obtain cleaning supplies and necessary PPE is uninterrupted.

Building Common Areas. Locations such as lobbies, registration, elevators, escalators, restrooms, concessions and furnishings are subject to a high volume of traffic. Touchpoints such as railings, buttons, handles, touchscreen kiosks, counters and fixtures are opportunities for transmission of the virus that causes COVID-19. In addition to nightly daily cleaning and disinfecting of these areas, housekeeping will increase attendants and cleaning frequency throughout the day within these areas depending on the anticipated occupancy in the buildings. Additional hand sanitizer dispensers will be installed throughout the building common areas adjacent to high touch areas for convenience and ease of use.

Office Areas. Locations such as offices, workstations, breakrooms, conference rooms and reception areas are subject to daily traffic and touchpoints. Housekeeping will clean and disinfect office areas on a daily basis with special attention placed on wiping down commonly touched surfaces and shared equipment. Disinfecting wipes and hand sanitizer will be available to employees in each office area for use throughout the day.

Loading Docks and Back of House Areas. Areas that facilitate shipping, receiving, maintenance and engineering functions will focus on cleaning and disinfecting tools and equipment that are shared and commonly used. IMC will also explore the effectiveness of disinfecting freight shipments that are received before transferring inside the buildings.

Meeting and Events Areas. Meeting rooms, seminar rooms, banquet rooms, exhibition halls will be cleaned as they are activated for functions. Focus will be to provide fixtures, furnishings and equipment that have hard surfaces and can be easily wiped down and disinfected. All room and floor sets shall accommodate physical distancing. Hand sanitizing stations will be available in close proximity to meeting areas.

Mechanical Areas. IMC will increase the frequency of replacing HVAC filters. Opportunities to increase fresh air intake will be implemented when outside conditions are suitable and mechanical equipment is capable. IMC will also explore retrofitting equipment with HEPA filters as well as identifying applications for UV-C disinfection.

Vehicles, Shuttle Buses and Scooters. All vehicles owned or leased by IMC and those contracted through third party operators will be cleaned and disinfected between each use. Focus will be

placed on commonly touched surfaces. For larger multi-passenger vehicles, foggers or mechanical sprayers may be utilized for ease of use and efficiency of the cleaning application. Hand sanitizer will be available on vehicles for passengers.