

BANK OF SOMEWHERE

PANDEMIC PLANNING POLICY

PURPOSE

1. Provide for the safety of employees and the public on an enterprise-wide basis;
 2. Ensure the survival of the **BANK OF SOMEWHERE** through an effective and on-going business impact analysis and risk assessment program;
 3. Protect the **BANK OF SOMEWHERE**'s assets and those of its customers;
 4. Validate the **BANK OF SOMEWHERE**'s Pandemic Planning Policy through effective testing, independent auditing and updating changes as necessary;
 5. Minimize the loss of customer and public confidence; and
 6. Facilitate the prompt resumption of operations.
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OVERVIEW

This policy provides guidance to assist **BANK OF SOMEWHERE** personnel in performing their respective duties and responsibilities to ensure the availability of critical financial services of the bank. The **BANK OF SOMEWHERE** realizes that operating disruptions can occur with or without warning, and the results may be predictable or unknown. Therefore, it is critical that the **BANK OF SOMEWHERE**'s business operations are resilient and the effects of disruptions in service are minimized in order to maintain public trust and confidence in the **BANK OF SOMEWHERE**. The **BANK OF SOMEWHERE** has implemented an effective Pandemic Planning Policy (PPP) to establish the basis to maintain and recover business processes when operations have been disrupted unexpectedly.

The **BANK OF SOMEWHERE**'s PPP ensures the maintenance or recovery of operations, including services to customers, when confronted with adverse events such as a pandemic.

The objectives of this plan are to mitigate risks from both internal and external sources:

1. Avoid or minimize financial loss to the **BANK OF SOMEWHERE**;
2. Avoid or minimize human loss of life or injury;
3. Continue to serve customers and financial market participants by resuming business operations and activities;
4. Mitigate the negative effects disruptions can have on the **BANK OF SOMEWHERE**'s strategic plans, reputation, operations, liquidity, credit quality, market position; and
5. Maintain ability to remain in compliance with applicable laws and regulations.

Changing business processes (internally to the **BANK OF SOMEWHERE** and externally among interdependent financial services companies) and new threat scenarios require the **BANK OF SOMEWHERE** to maintain an updated and viable PPP.

The **BANK OF SOMEWHERE**'s PPP takes into account the potential for wide-area disasters that impact an entire region and for the resulting loss or inaccessibility of staff. It also addresses

interdependencies, both market-based and geographic, among financial system participants as well as infrastructure service providers.

This policy identifies the types of emergencies which may occur and the procedures to be followed based on the severity of each situation. These contingency plans need mobilization only for those areas of the **BANK OF SOMEWHERE** which need control. This method allows all remaining segments to continue normal operations and functionality.

Each type of emergency defined within this policy is to be tested periodically to ensure that the outlined contingency plans are feasible and address all facets of a given emergency or disaster. With the same respect, this policy and other contingency plans are to be continually updated to current standards to reflect accurate and complete information regarding personnel, emergency services, evacuation plans, mobilization capabilities, and **BANK OF SOMEWHERE** data or equipment, etc.

EFFECTIVE DATE

All employees of **BANK OF SOMEWHERE** must comply with the terms of this policy immediately. Managers, employees and technical personnel must modify system configurations and procedures, if necessary, to comply with the terms of this policy within **TIME PERIOD**.

PANDEMIC INFLUENZA/VIRUSES PREPAREDNESS PROCEDURES

Federal regulatory agencies require financial institutions to develop and implement a preparedness strategy with respect to the threat and potential impact of a pandemic influenza/viruses event. The main components of this strategy address:

1. Establishing an ethic of infection control in the workplace that is reinforced during a pandemic occurrence, to include, if possible, options for working offsite while ill, systems to reduce infection transmission and worker education;
2. Establishing contingency systems to maintain delivery of essential goods and services during times of significant and sustained worker absenteeism;
3. Where possible, establishing mechanisms to allow workers to provide services from home if public health officials advise against non-essential travel outside the home; and
4. Establishing partnerships with other members of the sector to provide mutual support and maintenance of essential services during a pandemic.

BANK OF SOMEWHERE realizes the importance of playing a key role in the event of pandemic influenza/viruses to protect employees' health and safety in addition to limiting the negative impact to the bank and the economy and society in which it serves. As such, it is the policy of **BANK OF SOMEWHERE** to adhere to these guidelines by incorporating the following procedures outlined in this section.

Operational and Financial Impact Risk Assessment

The Impact Risk Analysis and Resource Allocation section of this topic addresses likely scenarios that may impact the **BANK OF SOMEWHERE**'s ability to deliver its products and services during a pandemic event (e.g. effect of restriction on mass gatherings, need for hygiene supplies, etc.), including the financial impact, and how to mitigate those risks.

Incident Response Team

The following **BANK OF SOMEWHERE** personnel are responsible for conducting pandemic event duties:

1. **LIST TITLES AND RESPONSIBILITIES HERE.**

Specifically, the **BANK OF SOMEWHERE**'s Incident Response Team is responsible for activating and terminating the **BANK OF SOMEWHERE**'s pandemic event preparedness and response plan, altering business operations (e.g. shutting down operations in affected areas), and transferring business knowledge to key employees.

Critical Third-Party Entities

The following third-party entities have been identified by the **BANK OF SOMEWHERE** as having a direct and critical support impact in which their services are required to maintain the **BANK OF SOMEWHERE**'s business operations during a pandemic event:

1. **LIST ENTITIES AND SUPPORT FUNCTIONS HERE.**

Workforce and Ancillary Requirements

Senior Management has determined the minimum workforce that will properly sustain the **BANK OF SOMEWHERE**'s mission critical operations in the event of employee absences during a disaster, such as a pandemic event, within the various resumption team topics in this policy. This determination includes such factors as personal illness, family member illness, community containment measures and quarantines, school and/or business closures, and public transportation closures.

In addition, it is the responsibility of the Incident Response Team to ensure communications and information technology resources are available as needed to support employee telecommuting and remote customer access requirements.

Alternate Worksites and Hours of Operation

The **BANK OF SOMEWHERE** has identified alternate worksites and hours of operation necessary to sustain all mission critical functions in the **BUSINESS CONTINUITY PLAN/DISASTER RECOVERY PLAN** that are applicable to a pandemic event or other such emergency or disaster recovery instance.

Staff Training

The following **BANK OF SOMEWHERE** personnel are responsible for staff training and preparing an ancillary workforce (e.g. contractors, alternate employees, retirees, etc.) in the event of a pandemic event:

1. **LIST TITLES AND RESPONSIBILITIES HERE. IN ADDITION, LIST ALL KEY EMPLOYEES OR CUSTOMERS WITH SPECIAL NEEDS AND RELATED REQUIREMENTS AS APPLICABLE.**

Specifically, the **BANK OF SOMEWHERE**'s pandemic training program includes the following elements:

1. A review covering pandemic fundamentals (e.g. signs and symptoms of influenza/viruses, modes of transmission), personal and family protection and response strategies (e.g. hand hygiene, coughing/sneezing etiquette, contingency plans);
2. Attempt to ease employee fears and anxiety from rumors and misinformation by providing facts, information, and support resources;

3. Ensure employee communications are culturally and linguistically appropriate;
4. Disseminate information to employees about the **BANK OF SOMEWHERE's** pandemic preparedness and response plan;
5. Provide information for the at home care of ill employees and family members;
6. Provide employees with alternative methods for communicating pandemic status and actions (e.g. hotlines, dedicated websites) to employees, vendors, suppliers and customers inside and outside the workplace in a consistent and timely way, including redundancies in the emergency contact system; and
7. Identifying community sources for timely and accurate pandemic information (domestic and international) and resources for obtaining counter measures (e.g. vaccines and antivirals).

Preventative Medicine and Access to Healthcare and Social Service Providers

The **BANK OF SOMEWHERE** routinely encourages its employees to take advantage of any potential influenza/viruses vaccines to mitigate the risk of infection and to promote an employee's well-being. To this extent, the **BANK OF SOMEWHERE** makes every effort to offer and track such vaccination programs for its employees on a periodic basis or during a pandemic event through its health care provider or other health care organization or agency.

In addition, it is the responsibility of the **BANK OF SOMEWHERE's** Incident Response Team to monitor and evaluate employee access to and availability of healthcare services (medical, mental, social services, faith-based resources, etc.) during a pandemic event and improve services as needed.

Direct Personal Contact Containment

The **BANK OF SOMEWHERE** has implemented the following minimum basic guidelines recommended by the Center for Disease Control (CDC) in an effort to mitigate the risk of **BANK OF SOMEWHERE** personnel or customers contracting or spreading the disease via face to face contact (e.g. hand-shaking, attending meetings, office layout, air filtration systems, etc.). Specifically, **BANK OF SOMEWHERE** personnel will be required to:

1. Pay careful attention to hand hygiene (washing hands frequently) before and after all employee or customer contact or contact with items potentially contaminated with respiratory secretions. Cleaning your hands often with soap and water removes potentially infectious material from your skin and helps prevent disease transmission. Waterless alcohol-based hand gels may be used when soap is not available, and hands are not visibly soiled;
2. Always use medical protection gloves supplied by the BANK OF SOMEWHERE;
3. Use proper cough or sneeze etiquette techniques; and
4. Always wear medical eye protection supplied by the BANK OF SOMEWHERE.

Managers must ensure the prompt exclusion and medical dismissal of any employee thought to exhibit influenza/viruses' symptoms for medical evaluation and treatment. In addition, the **BANK OF SOMEWHERE** provides at all its facilities sufficient and accessible infection control supplies (e.g. hand hygiene products, tissues and receptacles for proper disposal) and has installed a high efficiency particulate air (HEPA) filter in its heating and cooling air circulation systems.

Employee Compensation and Leave of Absence

As outlined in the **BANK OF SOMEWHERE's HUMAN RESOURCES GENERAL POLICY** and **HUMAN RESOURCES SALARY ADMINISTRATION POLICY**, the **BANK OF SOMEWHERE** will make every effort to ensure for employee compensation and sick leave absences, including special considerations on a case by case basis that are unique to a pandemic event (e.g. non-punitive, liberal leave, etc.). In addition, a previously ill employee who is no longer infectious may return to work after such an illness provided the employee has obtained a medical release signed by a physician.

Travel Impact and Alternatives

The **BANK OF SOMEWHERE** has identified the following personnel and/or business operations or functions that may be impacted by a restriction in domestic and international travel (e.g. quarantines, border closures):

1. **LIST TITLES OR FUNCTIONS HERE.**

Employee travel to affected geographic areas (consider both domestic and international sites) will be limited, and only in the event as an absolute business necessity. In addition, Senior Management will properly evaluate and consider evacuating employees working in or near an affected area when an outbreak begins and implement its contingency plan, including the events surrounding employees returning to and from affected areas. Specifically, **BANK OF SOMEWHERE** personnel are to use the following CDC recommendations:

1. Avoid close contact with people who are sick.
2. Avoid touching your eyes, nose, and mouth.
3. Stay home when you are sick.
4. Cover your cough or sneeze with a tissue, then throw the tissue in the trash.
5. Clean and disinfect frequently touched objects and surfaces using a regular household cleaning spray or wipe.
6. Follow CDC's recommendations for using a facemask.
 - a. CDC does not recommend that people who are well wear a facemask to protect themselves from respiratory diseases, including COVID-19.
 - b. Facemasks should be used by people who show symptoms of COVID-19 to help prevent the spread of the disease to others. The use of facemasks is also crucial for people who are taking care of someone in close settings.
7. Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom; before eating; and after blowing your nose, coughing, or sneezing.
 - a. If soap and water are not readily available, use an alcohol-based hand sanitizer with at least 60% alcohol. Always wash hands with soap and water if hands are visibly dirty.
8. For information about handwashing, see [CDC's Handwashing](#) website
9. For information specific to healthcare, see [CDC's Hand Hygiene in Healthcare Settings](#)
10. These are everyday habits that can help prevent the spread of several viruses. CDC does have [specific guidance for travelers](#).

Contact with Public Health Agencies

It is the responsibility of Senior Management and members of the Incident Response Team to maintain a line of communication with various community, state and federal agencies outlined below in an effort to:

1. Review the **BANK OF SOMEWHERE**'s pandemic incident preparedness plan with insurers, health plans, and major local healthcare facilities and understand their capabilities and plans;
2. Collaborate with federal, state, and local public health agencies and/or emergency responders to participate in their planning processes, share the **BANK OF SOMEWHERE**'s pandemic plans, and understand their capabilities and plans;
3. Communicate with local and/or state public health agencies and/or emergency responders about the assets and/or services the **BANK OF SOMEWHERE** could contribute to the community; and
4. Share best practices with other businesses in communities the **BANK OF SOMEWHERE** serves, chambers of commerce, and associations to improve community response efforts.

The **BANK OF SOMEWHERE** has identified the following public health agencies that **BANK OF SOMEWHERE** personnel may contact in the event of a pandemic event to obtain assistance, emergency management support and other important information:

- Centers for Disease Control (CDC)
<http://www.cdc.gov>
- Department of Agriculture (USDA)
<http://www.usda.gov>
- Department of Health and Human Services (DHHS)
<http://www.dhhs.gov/nvpo/pandemics/index.html>
- Department of Labor Occupational Safety and Health Administration (OSHA)
<http://www.osha.gov>
- Department of State
http://travel.state.gov/travel/tips/health/health_1181.html
- Pandemic Flu Website
<http://www.pandemicflu.gov>

- **LIST LOCAL COMMUNITY HEALTH ORGANIZATIONS HERE**

Emergency Communications

The **BANK OF SOMEWHERE** has established an emergency communications plan, including key contacts (with backups), chain of communications (including suppliers and customers), and processes for tracking and communicating business and employee status. Please refer to the Internal and External Communication topic of this policy for detailed guidance.

Plan Testing

The periodic testing of incident response procedures related to a pandemic event is part of the **BANK OF SOMEWHERE**'s Pandemic Planning Testing topic of this policy and may be revised accordingly.