

COVID-19 PREPAREDNESS AND RESPONSE PLAN

Highpoint Community Bank ("Company") takes the health and safety of our employees extremely seriously. With the spread of COVID-19 and the need for certain employees to continue in-person work, we are committed to reducing the risk of exposure to COVID-19 on the job and to promoting healthy and safe workplace practices for all employees.

This Plan is based on information and guidance from the CDC, OSHA and the State of Michigan at the time of its development and is subject to change based on further information provided by the CDC, OSHA, and other public officials. We are following the experts and are committed to following all legal requirements and to implementing best practices to protect our employees.

Because Michigan has issued directives under multiple different executive orders that have changed, and may likely change in the future, this Plan incorporates riders or attachments that will set forth the most current requirements and practices.

We have identified the following potential sources of possible spread COVID-19 in the workplace:

- The general public
- Customers
- Co-workers
- Vendors/visitors

Our employees fall into the following categories:

- Lower exposure risk (the work performed does not required direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public).
- Medium exposure risk (the work performed requires frequent and/or close contact with people who may be infected with COVID-19 but who are not known COVID-19 patients, or contact with the general public in areas where there is ongoing community transmission).

We are implementing all of the measures discussed in this plan to prevent employees from being exposed to COVID-19.

COVID-19 WORKPLACE COORDINATORS

We have designated the following individuals as our COVID-19 Workplace Coordinators:

Mark Kolanowski, President and CEO, mark@hcb.us, ph. 269-945-2401

Kim Finkbeiner, VP Operations, kimf@hcb.us, ph. 269-945-2401

Amanda Currier, VP Controller and Compliance Officer, ph. 269-945-2401

Julie Palmatier, AVP Human Resources Director, juliep@hcb.us, ph. 269-945-2401
Nancy Goodin, VP Marketing Director, ngoodin@hcb.us, ph. 269-945-2401
Ashley Ulberg, AVP Retail Banking, aulberg@hcb.us, ph. 269-945-2401

The Coordinators are responsible for staying abreast of federal, state and local guidance and incorporating those recommendations into the Company's workplace. The Coordinators are also responsible for reviewing human resources policies and practices to make sure that they are consistent with this Plan and existing federal, state and local requirements.

We have also designated one or more worksite supervisors to implement, monitor, and report on the COVID-19 control strategies contained in this Plan. This supervisor(s) will remain on the premises at all times when employees are present on site. Each site will be notified of their on-site supervisor.

RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

RESPONSIBILITIES OF EMPLOYEES

Every one of our employees is expected to help with our prevention efforts while at work. To minimize the spread of COVID-19 at our worksite(s), everyone must play their part. As set forth below, we are instituting various housekeeping, social distancing, and other best practices at our workplace(s) to minimize exposure to COVID-19 and prevent its spread in the workplace. All employees must follow these best practices at all times for them to be effective. Beyond these best practices, we require employees to report immediately to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If employees have a specific question about this Plan, they should ask their manager or supervisor or contact the Human Resources Department. If employees have concerns about their working conditions or safety, they should contact a Human Resources representative, a COVID-19 Workplace Coordinator, and their the worksite supervisor(s) designated to remain on site, to implement, monitor, and report on the rules and measures contained in this Plan.

OSHA and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.

- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.
- Practice routine cleaning and disinfection of frequently touched objects and surfaces and avoid using other employee's phones, desks, offices or other work tools and equipment when possible.
- While COVID-19 is a pandemic, maintain appropriate social distance of six feet to the greatest extent possible and avoid large gatherings.

In addition, employees must familiarize themselves with the symptoms and exposure risks of COVID-19. Symptoms may occur 2 - 14 days after exposure to the virus. The primary symptoms of COVID-19 include the following:

- Uncontrolled cough;
- Fever (either feeling feverish or a temperature of 100.4 degrees or higher);
- New onset of shortness of breath or difficulty breathing

Or, at least two of the following not explained by a known medical or physical condition: loss of taste or smell, muscle aches, sore throat, severe headache, diarrhea, vomiting, or abdominal pain.

If employees develop a fever and symptoms of respiratory illness, such as an atypical cough or shortness of breath, they must not to report to work or leave work immediately, notify their supervisor immediately after leaving the premises, and consult their healthcare provider. Likewise, if employees come into close contact with someone showing these symptoms, they must notify their supervisor immediately and consult their healthcare provider. Do so without coming into the facility. The Company will work to identify any employees who have close contact with individuals with COVID-19 symptoms.

"Close contact" is not brief or incidental contact with a person with COVID-19 symptoms. Instead, the CDC defines "close contact" as either:

- Being within approximately six feet of a COVID-19 infected person or a person with any COVID-19 symptom(s) for a "prolonged period of time;" or
- Having direct contact with infectious secretions of a COVID-19 infected person or a person with any COVID-19 symptom(s) (e.g., being coughed on).

There is no precise definition of "prolonged period of time." CDC estimates range from 10 to 30 minutes. To protect employees, we are using the lower end of this range and consider a prolonged period to be 10 or more minutes of exposure.

WORKSITE PREVENTATIVE MEASURES

Minimizing exposure from co-workers. The Company will take the following steps to minimize exposure from co-workers to COVID-19:

- Provide all employees with non-medical grade face coverings to wear while at work
 - Require employees to wear masks when they cannot consistently maintain six feet of separation from other individuals in the workplace
 - Consider face shields when workers cannot consistently maintain three feet of separation from other individuals in the workplace.
 - Consider use of other PPE as appropriate.
- Educate employees on protective behaviors that reduce the spread of COVID-19 and provide employees with the necessary tools for these protective behaviors, including the following:
 - Post CDC information, including recommendations on risk factors at home and in the community
 - Train all employees on the workplace infection-control practices in place, the proper use of personal protective equipment (PPE), the steps employees must take to notify the Company if they experience any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19, and how to report unsafe working conditions, including available reporting avenues.
 - Maintain a record or log of all employees who received training
 - Provide tissues and no-touch disposal receptacles to minimize exposure to infectious secretions.
 - Inform employees of the importance of good hand hygiene and provide time for employees to wash hands regularly with soap and water for at least 20 seconds because this is one of the most effective ways for employees to minimize exposure to COVID-19. If soap and water are not readily available, employees should use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water should be chosen over hand sanitizer.
 - Encourage good hand hygiene by ensuring that adequate supplies of soap and hand sanitizer are maintained and placing hand sanitizers in multiple locations.
 - Discourage handshaking and instead encourage the use of other noncontact methods of greeting
 - Remind employees to avoid other employees' phones, desks, offices, other work tools and equipment, and other commonly touched surfaces when possible. If necessary, clean and disinfect them before and after use.
 - Remind employees that they should not share food utensils and food with other employees.
 - Remind employees that they should wear masks, at a minimum, whenever they cannot consistently maintain six feet of distance from others while working.

- Encourage and require social distancing to the greatest extent possible while in the workplace.
- Encourage employees to minimize ride-sharing. While in vehicles, employees must ensure adequate ventilation and are encouraged to use PPE (e.g. facemasks) and hand sanitizer when riding with other employees.
- Encourage employees to use PPE (e.g. facemasks) and hand sanitizer if using public transportation to travel to work.
- Develop protocol for social distancing practices
 - Evaluate areas in which employees work within 6 feet of each other and determine options to increase distance apart.
 - Limit in-person meetings
 - Indoor are allowed where attendance is limited up to 20 persons per 1,000 square feet of space in each occupied room and all attendees wear a face covering.
 - Restrict the number of workers present on-site to no more than necessary
 - Consider staggered shifts, break times, etc.
 - Consider new shifts or rotational shift schedules where possible
 - Promote remote work to the extent work can feasibly be completed remotely.
 - Deliver products through curb-side pick-up or delivery
 - Suspend all non-essential in-person visits
- Restrict employees from the workplace if they display symptoms of COVID-19
 - Conduct a daily entry self-screening protocol for all employees or contractors entering the workplace. This will include, at a minimum, a questionnaire to determine whether the employee has symptoms of COVID-19 or exposure to an individual that could have COVID-19.
 - Maintain documentation or a log showing this daily protocol was followed.
 - Encourage employees to self-report to supervisor as soon as possible after developing symptoms of COVID-19
 - Immediately separate any employee with symptoms from other individuals and send him/her home.
 - Allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the most recent CDC guidance.
- Actively encourage sick employees to stay home
 - Apply available paid time off options and flexible attendance requirements
 - Follow state and federal guidance for return to work
 - Implement protocol for return to work after symptoms of COVID-19

- Actively encourage employees to stay home if they have been in close contact with a confirmed or suspected case of COVID-19
 - Encourage employees to self-report to supervisor as soon as possible after close contact with a confirmed or suspected case of COVID-19.
 - Employees who are well but who have a sick family member at home with COVID-19 should notify their supervisor and follow CDC recommended precautions.
 - Apply available paid time off options and flexible attendance requirements
 - Follow state and federal guidance for return to work
 - Implement protocol for return to work after potential exposure to COVID-19

- Develop protocol to follow if an employee has a confirmed case of COVID-19
 - Isolate-and send potentially exposed employees home
 - Notify all individuals who were in close contact with the employee during the period the employee was contagious and send those employees home to self-isolate for 14 days from the date of last close contact.
 - Notify the Company's leadership of the confirmed case of COVID-19
 - Within 24 hours of learning of employee who tests positive for COVID-19:
 - Notify the local public health department
 - Notify any co-workers, contractors, or suppliers/vendors who may have come in contact with the person with a confirmed case of COVID-19
 - Document efforts resulting in notification
 - Evaluate OSHA reporting/recordkeeping requirements
 - Implement protocol for return to work, including CDC-recommended cleaning and disinfecting in all affected areas, including shutting affected areas as necessary
 - Allow employees with a confirmed or suspected case of COVID-19 to return to the workplace after they have been advised by a health or public health professional that they may return to work, or when all of the following are met: (1) 24 hours have passed since the resolution of fever without the use of fever-reducing medication; (2) 10 days have passed since symptoms first appeared or they were administered the test that yielded the positive result; and (3) other symptoms have improved.
 - Maintain a log of symptomatic workers and workers who test positive for COVID-19
 - Maintain records of notification to local health department and all individuals who may have come into contact with the infected employee

- Perform increased routine environmental cleaning and disinfection
 - Instruct employees sanitize the work areas upon arrival, throughout the workday, and immediately before departure. Make cleaning products available to employees to perform this cleaning on a regular basis.

- Routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
- Provide disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, remote controls, desks, other work tools and equipment) can be wiped down by employees before each use.
- Provide employees with time to wash their hands regularly or, alternatively, use alcohol-based hand sanitizer.
- Maintain Safety Data Sheets of all disinfectants used on site
- Eliminate/restrict work-related travel to only essential to the Company's business and limit employees' exposure to employees who traveled until the Company can confirm traveling employee does not have COVID-19 symptoms.
- Plan to monitor and respond to absenteeism
 - Implement plans to continue your essential business functions in case you experience higher than usual absenteeism.
 - Cross-train employees to perform essential functions so the workplace can operate even if key employees are absent.
- Remind employees about the employee assistance program (EAP) resources and community resources as needed.
- Talk with companies that provide contract employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies.

Remote Work

Employees should work remotely if it is feasible for the employee to work remotely. In deciding whether an employee can work remotely, we will consider the employee's job responsibilities and the employee's individual circumstances that may impact whether it is feasible for the employee to work remotely. If you have been asked to work onsite but believe that it is feasible for you to work remotely, please contact a supervisor or Human Resources.

Minimizing exposure from customers/clients

- Evaluate what business practices are needed to maintain critical operations (e.g., identify alternative suppliers, prioritize existing customers, or temporarily suspend some of your operations if needed).
- Establish policies and practices for social distancing. Alter workspace to help social distancing and physically separate employees from each other and customers, when possible. Develop protocol for social distancing practices
 - Mark 6-foot distance in areas in which customers might gather/wait

- Limit number of customers allowed into workplace according to attendance requirements.
 - Adjust business practices to reduce close contact with customers. Minimize face to face contact (e.g., drive-through windows).
 - Deliver services remotely (e.g., phone, video or web).
 - Implement flexible meeting and travel options (e.g., postpone non-essential meetings or events in accordance with state and local regulations and guidance).
 - Close or limit access to common areas where employees are likely to congregate and interact.
- Post information on reducing the spread of COVID-19
 - Evaluate options for assessing symptoms of COVID-19 and removing individuals from the workplace with symptoms
 - Consider physical barriers between employees and customers
 - Consider making masks available to customers/clients

Minimizing exposure from visitors/vendors

- Talk with business partners about the Company's Plan.
- If needed, identify alternate supply chains for critical goods and services. Some goods and services may be in higher demand or unavailable.
- If possible limit, the number of visitors to the worksite.
- Develop protocol for health screening/questionnaire for visitors/vendors

Minimizing exposure from the general public

- Be prepared to change business practices if needed to maintain critical operations (e.g., identify alternative suppliers, prioritize existing customers, or temporarily suspend some of your operations if needed).