A large, stylized 'X' logo composed of two overlapping curved shapes. The left shape is black and the right shape is light blue.

Pandemic/ Epidemic Plan

Exela Technologies

Version 6.0 - Revision 1.4

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1 Introduction

Exela Technologies, Inc., its subsidiaries and affiliates (collectively, “Exela”) is committed to implementing emergency management and business continuity principles by developing plans and procedures necessary to maintain readiness to react to disasters and business interruptions. The overall goal of this effort is to minimize the effects of disasters and emergencies for all Exela associates and our customers. This document provides guidelines for managing Exela’s operations with high (up to 40%) absenteeism associated with a regional health emergency (Pandemic/Epidemic). The term Pandemic will be used throughout this document to represent a regional Epidemic or a larger area Pandemic.

In the event of a business interruption, this plan along with the Business Continuity Plan are designed to demonstrate the effort and activities involved in managing the lifecycle of a pandemic event from preparedness activities to the resumption of normal business functions.

To facilitate Exela’s response to a pandemic threat, a virtual Crisis Communication and Management Team is formed. This cross-functional team includes individuals from the following departments:

- Operations
- Legal
- Human Resources
- Development and IT
- Information Security and Risk

This Pandemic/Epidemic Plan (referred to as the “Plan”) was developed utilizing materials and best practices from a number of resources including pandemic planning recommendations from the World Health Organization (WHO), U.S. Centers for Disease Control (CDC), government and other domestic and international sources. The purpose of this Plan is to aid in the planning process.

Because of the inability to accurately predict when the next pandemic will occur it is essential that a Checklist is established, reviewed, and updated regularly. It is important to keep in mind that Pandemic Phases can escalate quickly. Adequate preparedness is critical in order to prevent disease spread within Exela and maintain business continuity for essential Exela products, services, and customers.

1.1 EXELA’S MANAGEMENT APPROACH

Exela’s approach to monitoring and managing a pandemic threat is to:

- Provide staff with Health Safety tips based on recommendations from WHO and the CDC. Partner with Human Resources to monitor staff absences for potential SLA impact.
- Assess client current and near-future workload.
- Bring in temporary staff as appropriate.
- Activate the Business Continuity Plan to move work to less impacted sites, if appropriate.

1.2 PLAN

This Plan builds on guidelines and recommendations from country, state, and other multinational company pandemic response plans. The goals of this Plan are to prevent and control the spread of disease within Exela and maintain business continuity by delivering essential products and services to Exela customers.

The Plan is intended to provide additional information in support of existing Business Continuity plans as they relate to pandemic preparedness. This Guide along with the Emergency Action Plan are implemented for any infectious disease that could cause a pandemic, such as avian or swine influenza.

The information in this Plan includes instructions, suggestions, and a Pandemic Planning Checklist (referred to as the Checklist in the remainder of this document) for site management teams to use to determine necessary action. The Plan includes the following:

- Pandemic Crisis Management Roles and Responsibilities of the On-Site Pandemic Response Team
- OnSite Pandemic Phases
- Checklist to aid in planning

1.3 PROCESS OVERVIEW OF SITE PANDEMIC PREPAREDNESS PLANNING

At a minimum, the Checklist and Plan will be reviewed annually by On-Site Pandemic Response team. The Business Continuity/Disaster Recovery team will review this Plan and company recommended checklists and plans annually.

2 WHO Pandemic Influenza Risk Management

2.1 WHO 2013 GUIDANCE

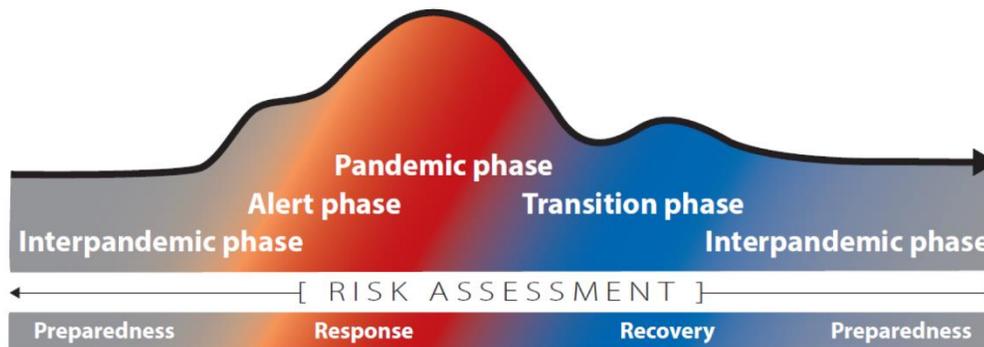
The approach taken in the WHO 2013 guidance applies the principles of all-hazards Emergency Risk Management for Health (ERMH) to pandemic influenza risk management. The objectives of ERMH are to:

- Strengthen capacities to manage the health risks from all hazards;
- Embed comprehensive emergency risk management in the health sector; and
- Enable and promote multi-sectoral linkage and integration across the whole of government and whole of society.

This guidance, therefore, aligns more closely with the disaster risk management structures already in place in many countries and underscores the need for appropriate and timely risk assessment for evidence-based decision-making at national, subnational and local levels.

2.2 RISK-BASED APPROACH

In response to lessons learned from the influenza A(H1N1) 2009 pandemic, a revised approach to global phases is introduced in the WHO guidance. The global phases have been clearly uncoupled from risk management decisions and actions at the country level. Thus, Exela facilities are encouraged as far as possible to use national risk assessments to inform management decisions for the benefit of their country's specific situation and needs.



Interpandemic Phase: This is the period between influenza pandemics.

Alert phase: This is the phase when influenza caused by a new subtype has been identified in humans. Increased vigilance and careful risk assessment, at local, national and global levels, are characteristic of this phase. If the risk assessments indicate that the new disease is not developing into a pandemic strain, a de-escalation of activities towards those in the Interpandemic Phase may occur.

Pandemic Phase: This is the period of global spread of human influenza caused by a new subtype based on global surveillance. Movement between the Interpandemic, Alert and Pandemic Phases may occur quickly or gradually as indicated by the global risk assessment, principally based on virological, epidemiological and clinical data.

Transition phase: As the assessed global risk reduces, de-escalation of global actions may occur, and reduction in response activities or movement towards recovery actions by countries may be appropriate, according to their own risk assessments.

3 Exela Pandemic/Epidemic Response

3.1 SITE PANDEMIC PHASE MATRIX

The Site Pandemic Phase Matrix is based on the WHO pandemic alert phases of 2013. (BC-DRTeam recognizes that other pandemic threat level/phase definitions exist. The Pandemic Phases below should be used for Exela pandemic planning.) The Pandemic Phases are based on the level of person-to-person transmission and how widespread the disease is in humans. Planning and response measures are based on these Pandemic Phase.

Interpandemic Phase	Alert Phase	Pandemic Phase	Transition Phase	Interpandemic Phase
No action required- monitoring only	<ul style="list-style-type: none"> > Initiate Pandemic Planning review > Monitor agencies for recommended actions > Monitor staff absence > Post basic Stay Healthy information 	<ul style="list-style-type: none"> > Implement more aggressive preventative measures based on WHO and CDC recommendations > Activate plan appropriate to staff impact. Consider additional temporary staff or activate Business Continuity Plan to move work to staffed DR sites 	Scaling back actions taken as the pandemic weakens	No action required- monitoring only

3.2 MONITORING A PANDEMIC

The Business Continuity-Disaster Recovery Team (BC-DR Team) will monitor WHO, U.S. CDC and appropriate government representatives to determine the site pandemic threat level. The Disaster Recovery Manager will also consult with Site Operations Managers and Disease Prevention Coordinator regarding any impact on attendance.

If resources are reduced and SLAs impacted, the Crisis Communication & Management Team (CCMT) may activate the Business Continuity Plan.

3.3 ON-SITE PANDEMIC TEAM

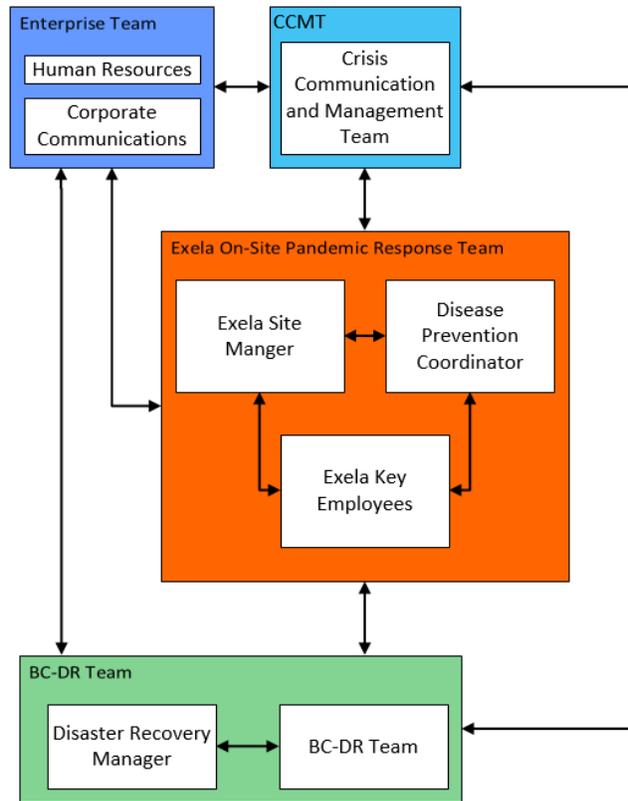
In order to effectively respond to a major infectious disease crisis such as an influenza pandemic, a clear structure of site teams is established. These guidelines require Exela locations to establish an On-Site Pandemic Response Team, conduct risk assessments and develop response plans, and conduct bi-annual exercises to test the plans and the team’s ability to respond.

3.3.1 Crisis Communication and Management Team

The CCMT is an established virtual team of key Exela senior management and executives responsible for the overall corporate response to a crisis. Their focus is on Exela Technologies as a whole. The CCMT is responsible for ensuring that local preparations are satisfactory and will likely direct response efforts among On-Site Pandemic Response Teams during a crisis event.

3.3.2 On-Site Pandemic Response Team

Each Site Manager will identify an On-Site Pandemic Response Team that will consist of the Site Manager and several managers or other key individuals as may be thought prudent (with no less than three people comprising the team). The team will receive additional Pandemic Response training and at the time of a Pandemic will act as the on-site liaison to the CCMT.



One person on this team will act as the Disease Prevention Coordinator. He/she will be responsible for educating the Exela Team as a whole on disease prevention and what precautions to take prior to and during a Pandemic.

3.3.3 BC-DR Team

The Disaster Recovery Manager has a critical role in the Exela pandemic preparedness process and is responsible for monitoring the status of the disease and in conjunction with the On-Site Pandemic Response Team, determining the pandemic threat level for sites.

The BC-DR Team will support the Disaster Recovery Manager. This team leads the general crisis management planning process, assists sites with the development of emergency response and business continuity plans, and maintains the corporate database of all site emergency action plans.

3.3.4 Enterprise Team

The Enterprise Team consists of representatives from Corporate Communications and Human Resources. The Enterprise Team is tasked with developing the corporate-wide communications plan to educate employees and families, as appropriate, about the risks of the communicable disease and the preparations Exela has taken to protect employees and maintain business operations during a disease outbreak. The Enterprise Team also assists the On-Site Pandemic Response Teams in developing their specific communication strategies by providing templates and consulting advice.

3.4 OTHER CONSIDERATIONS

Depending on the specific nature of the disease other measures may be taken to help prevent the spread or limit the possibility of contracting the disease. These may include, but are not limited to:

- Travel restrictions for domestic and/or international.
- Notify customers, vendors, and other key contacts of our intent to limit physical access to our facilities to employees, essential contractors and visitors as per specific business requirements.
- Provide additional training directed at the specific disease.
- Append the addendum to this document that is specific to the disease under consideration.
- Possible sequestering of Management.
- Assessing client current and near-future workload for any staffing decisions that need to be made.
- Bring in temporary staff as appropriate.
- Move work to other, less impacted locations for processing.

3.5 AFFECTED EMPLOYEES

Exela expects employees who contract a disease or any other pandemic health issue or have been exposed to infected family members or other individuals to stay home and seek medical attention as necessary and appropriate. Such workers should notify their manager as soon as possible of exposure or illness. At Exela's discretion or the direction of outside authorities, Exela may require the isolation and quarantine of any infected employees who come to work despite exposure or need for medical attention.

Workers must notify their immediate supervisor and Human Resources of any change in emergency-contact information; they must do so within two weeks of a change. When providing such information, employees, especially those who have children or care for elderly relatives, should identify individuals on whom they can depend if the employees themselves become sick at work and must be isolated and quarantined. Supervisors are required to maintain in the workplace and in Security Plans Management (SPM) an up-to-date emergency-contact list for their unit or department.

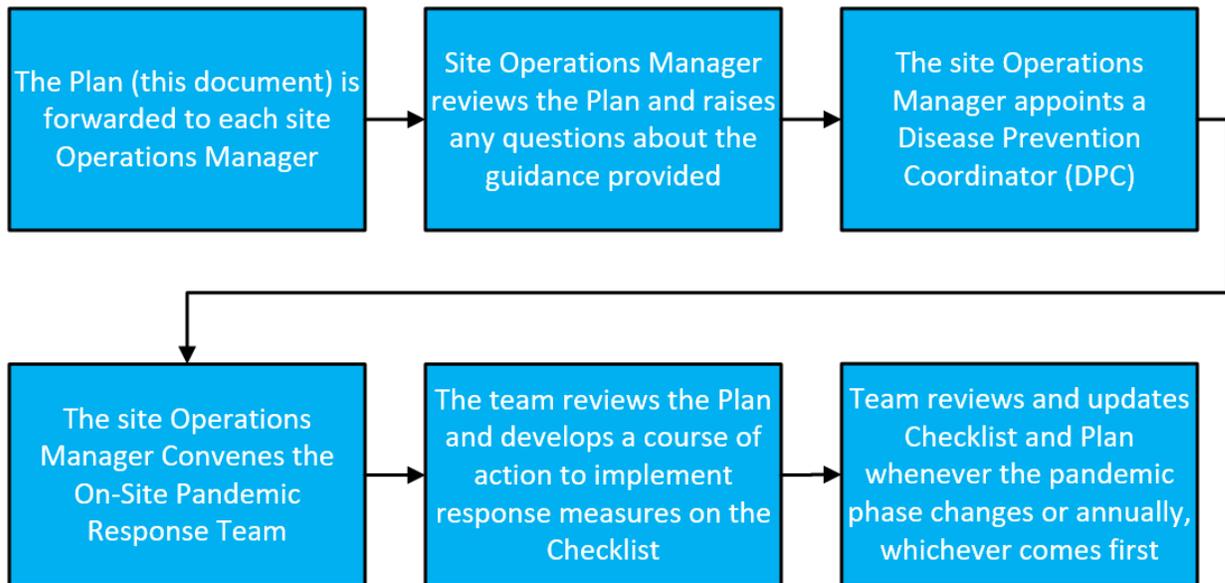
3.6 MANDATORY EMPLOYEE TRAINING

All employees are at risk of exposure to diseases, both in and outside the workplace; therefore, Exela requires all employees to attend initial or refresher training bi-annually to become informed about what to do when a flu outbreak occurs covering such issues as availability of flu shots, symptoms and health effects of influenza, treatment, and sources to contact for appropriate medical care, steps to take if exposure is suspected; company representatives to whom to report known or suspected exposures, and procedures for reporting exposure to co-workers, family members, friends, or others who are ill with the disease; proper use of Exela-provided personal-protection equipment; proper hygiene in the workplace and at home; and communications.

Training is based on scenarios developed to test employees' understanding of our planned emergency response. Supervisors are responsible for recording and maintaining documentation on every employee's participation in required training.

4 The Process

4.1 OVERVIEW OF SITE PANDEMIC PREPAREDNESS PLANNING



1. The Plan is distributed to each site Operations Manager.
2. The Site Manager should review the document and raise any questions they may have by contacting the BC-DRTeam@exelaonline.com.
3. The Site Manager appoints a Disease Prevention Coordinator (in some cases this may be themselves). The Disease Prevention Coordinator is responsible for educating the Exela on-site employees in disease prevention and control.
4. The Site Manager appoints and convenes the On-Site Pandemic Response Team to review the Plan.
5. The Team reviews the Plan and develops a plan to implement response measures on the Checklist appropriate to Pandemic Phase.
6. The Team completes the Checklist according to current Pandemic Phase and sends it to BC-DRTeam@exelaonline.com. Whenever the Pandemic Phase changes, the Team must review and update the Checklist in SPM.

4.2 PANDEMIC AWARENESS TRAINING

It is essential for all workers at Exela sites to be informed about Exela's global pandemic preparedness plan. A Pandemic Awareness Training has been provided to assist site Operations Managers and the Disease Prevention Coordinator with informing employees about Exela's global pandemic preparedness plan. This document can also be found on your specific Learning and Development System.

4.3 PANDEMIC CHECKLIST

The Pandemic Planning Checklist consists of four broad categories of response measures that are necessary to prevent and control disease spread at an Exela site. These categories include the following:

Disease Prevention & Control

- Public Health Education & Communication
- Medical Prevention and Supplies
- Social Distancing and Medical Surveillance
- Workplace Hygiene

In addition, starting on page two of the Checklist, there are five broad categories that are necessary for maintaining business continuity. These categories include the following:

Business Continuity

- Business Travel
- Workforce
- Materials
- Facilities and Equipment
- Supporting Elements

Many of the response measures are straightforward and easily implemented. Other measures require more in-depth planning. Site Managers and/or On-Site Pandemic Response Team have been identified to carry out the planning efforts on the Checklist.

The level of response is based on the site Pandemic Phase. The Checklist must be completed to document all response measures corresponding to the site's current Pandemic Phase. As an example, if the site is at Inter-Pandemic Phase, the response measures for Inter-Pandemic on the Checklist must be completed.

The On-site Pandemic Response Team completes the Checklist to the current Pandemic Phase identified for the site. The Checklist must be updated by the site and sent to the BC-DRTeam@exelaonline.com when the site Pandemic Phase changes. The Disaster Recovery Manager and the BC-DRTeam, will review the site Checklists. Status reports will be submitted to the Crisis Communication and Management Team as needed.

Rev. 20200306 Status			Checklist – Page 1				Pandemic Phase			
Completed	In Progress	Not Started	Response Measure				Interpandemic	Alert	Pandemic	Transition
			Disease Prevention and Control							
			Disease Education							
			Educate staff on basic hand washing hygiene					X		
			Educate staff on respiratory hygiene					X		
			Educate staff on flu or other communicable disease symptoms					X		
			Communicate preparedness plans to employees				X	X		
			Communicate local disease status to staff					X	X	X
			Educate on personal workspace cleaning				X	X		
			Medical Prevention and Supplies							
			Plan for and obtain adequate supply of waterless hand cleanser for associate use					X	X	X
			Plan for and obtain a supply of Nitrile gloves More info here					X	X	X
			Plan for and obtain a supply of face masks More info here OSHA info					X	X	X
			Plan for and obtain an adequate supply of single-use thermometers					X	X	X
			Plan for and obtain an adequate supply of surface disinfectants					X	X	X
			Plan for and obtain an adequate supply of disposable facial tissues					X	X	X
			Social Distancing and Medical Surveillance							
			Assess remote access capabilities (if applicable)					X		
			Require workers to contact their supervisor <u>immediately</u> if disease symptoms develop at work					X	X	
			Educate on the rationale for social distancing and medical surveillance					X		
			Consider mandatory temperature checks upon entry into the site for all people						X	X
			Site Team to notify Disaster Recovery Manager of suspected/confirmed cases of the current pandemic disease for potential Business Continuity activities					X	X	
			Require medical clearance before return to work for anyone with flu-like symptoms or who is absent for three consecutive days						X	X
			Implement procedures to maintain at least 3 - 6 feet between people working at a site where practical						X	
			Workplace Hygiene							
			Remove any common towels or drinking cups from the workplace and replace with disposable supplies					X	X	X
			Ensure adequate waste disposal containers					X	X	X
			Ensure adequate inventory of workplace cleaning supplies					X	X	X
			Ensure adequate supplies of paper towels					X	X	X
			Increase the frequency of surface cleaning (including cafeteria, break rooms, restrooms, conference rooms, etc.)					X	X	X

Rev. 20200306			Status	<p style="text-align: center;">Checklist – Page 2</p> <p style="text-align: center;">Response Measure</p> <p style="text-align: center;">Business Continuity</p>	Pandemic Phase			
Completed	In Progress	Not Started			Interpandemic Alert	Pandemic	Transition	
			Business Travel					
			Provide travel health education to business travelers		X			
			Educate business travelers regarding any International alerts or restrictions		X			
			Identify and track business travelers from the site that travel outside of the home country		X			
			Monitor travel advisories from local authorities		X	X		
			Prohibit business travel to and from and through Pandemic Phase countries		X	X		
			Prohibit business travel to and from and through Pandemic Phase countries/regions/localities.		X	X		
			Workforce					
			Identify essential personnel		X	X		
			Assess the level of cross-training on essential knowledge/skills; develop a plan to address any identified gaps;	X				
			Implement/Adjust work schedule based on cross-training plan			X		
			Develop alternate operational management hierarchy	X				
			Work with a supplier of non-Exela workforce to develop and implement a plan to provide essential knowledge/skills/certifications		X			
			Activate and publicize the Exela Human Resources hotline to provide assistance, guidance, and answers to associates affected by the pandemic outbreak. Hotline messages can include benefits information and/or return-to-work procedures.		X	X	X	
			Materials					
			Identify alternate suppliers for materials/supplies needed to support essential products/services	X	X			
			Secure contacts for an alternate supply of materials/supplies		X	X		
			Identify alternate means to transport products (couriers)	X	X			
			Review contingency plan to respond to a loss of externally supplied utilities	X				
			Facilities and Equipment					
			Review and update plan for safe shut down of operations/facility including arming and disarming of burglar alarm		X			
			Identify the equipment needed to support essential products/services		X			
			Identify and provide for routine maintenance to assure the operation of essential equipment during the crisis		X			
			Identify any systems that are critical to maintaining essential services and require periodic physical intervention to keep them running		X			
			Test alternate work locations	X				

Rev. 20200306 Status			<p style="text-align: center;">Checklist – Page 3</p> <p style="text-align: center;">Response Measure</p> <p style="text-align: center;">Business Continuity</p>	Pandemic Phase			
Completed	In Progress	Not Started		Interpandemic	Alert	Pandemic	Transition
			Supporting Elements				
			Establish crisis-specific HR policies on sick leave, absence, refusal to come to work, etc.		X	X	
			Develop method to communicate “current” management hierarchy to workforce and third-party vendors		X	X	
			Forecast demand for essential products during the crisis		X	X	
			Forecast demand for essential support services during the crisis		X	X	
			Communicate preparedness plan to employees	X	X	X	X
			Communicate site operational status to employees via Human Resources Hot Line			X	X
			Communicate preparedness to select customers as required under BCP plans and/or contracts		X	X	
			Establish alternate work locations for the leadership team			X	

Zero-Day Pandemic Plan Addendum - COVID-19

In light of the current disease threat, the following steps should be taken to help reduce the possibility of Exela Employees contracting and/or spreading the disease.

Worker Illness - Any worker who feels ill with flu like symptoms (as defined by the current threat) should not report to work but notify their manager immediately. Self-quarantine based on the current threat recommendation may be required. Based on the current risk exposure, a doctor's release may be required to return to work. Exela may have to report any or all cases of exposure to the proper authorities.

Any worker who becomes ill while at work should inform their manager and make immediate arrangements to leave the facility. Additional cleaning may be required in and around where the ill person was working. Additional quarantine steps may be required by local, state, or federal entities for any or all persons in or around the ill person.

Employee Time Off - Exela provides employees with a number of time off programs and will vary by country. In all cases these should leveraged to address employee concerns.

Given that the local medical community may require employees to self-quarantine even if they show no symptoms as we continue to work through the current disease situation, we ask that all employees seeking a period of self-quarantine initiate their request by contacting our designated leave administrator. The administrator will work with your employee, their medical practitioner, the WHO or local equivalent. If an extended leave is needed, for any reason including but not limited to a self-quarantine, the administrator representatives will advise. If approved for a leave, all leave policies will be followed including personal leave, short-term disability and long-term disability.

Should you have any questions about any content shared in this memo, please contact your leader or your respective HR representative.

Travel - All travel is restricted and must be reviewed and approved by the regional President.

In lieu of travel and face-to-face meetings, we urge all employees to take advantage of GoTo Meeting Services. In some scenarios we will be notifying customers, vendors, and other key contacts of our intent to limit physical access to our facilities to our employees, essential contractors and visitors as per specific business requirements.

Education / Training - Personal hygiene posters are available and have been distributed to all our Operations.

Training modules have been published that include a Train-the-Trainer presentation that provides resources to all Pandemic Disease Coordinators to enable them to better train their local staff.

Another available module is the Personal Hygiene presentation that walks the user through the proper way to wash hands, maintain social distancing and cleaning techniques that may prove to be helpful. These modules are available on Exela's various Learning Management Systems. Please contact your local or regional human Resources Business Partner or Representative for access to the appropriate system.

Additional Steps – It is mandatory that all Operations fill out the Pandemic Checklist (found at the back of the Pandemic Plan or available in an Excel format) and return it to BC-DRTeam@exelaonline.com ASAP. We need to know that all sites are complying with the steps that are required at the current phase of the event.

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Version Approval History

Version	Date	Approver	Title
5.1	11/9/2016	Thomas Dolan	VP of Information Security and Risk
5.2	4/19/2017	Thomas Dolan	VP of Information Security and Risk
5.3	4/2/2018	Thomas Dolan	VP of Information Security and Risk
6.0	7/26/2019	Thomas Dolan	SVP of Information Security and Risk
V_6	1/15/2020	Thomas Dolan	SVP of Information Security and Risk

Revision Change History

Revision	Date	Author(s)	Revision Details
5.1	11/9/2016	Steve Cross	V5.1 – Sec. 4 - Updated Alternate Call Center location to Mumbai, India. Added 4.1.a.i.3 and 4.1.a.ii.3.
5.1	1/20/2017	Steve Cross	Reviewed for accuracy.
5.2	4/19/2017	Steve Cross Stephanie Haynes Jeff Hess	V5.2 – Removed specific references to Exela Technologies and BancTec. Added Exela Logo. Removed sections not relevant to Pandemic. Changed name of the document.
5.3	3/30/2018	Steve Cross	V5.3 – Re-Branded to Exela Technologies. Reviewed for accuracy.
6.0	7/19/2019	Stephanie Haynes, Steve Cross	V6.0 Re-write of the documents to conform to Exela Policies and Standards. Added the Pandemic checklist to the document.

V_6_R_1.0	1/10/2020	Stephanie Haynes, Steve Cross	R_1.0 Reviewed and updated for 2020. Changed document name to <i>Pandemic/Epidemic Plan</i> . Changed Version Listing to be consistent with other Exela Documents. Edited Checklist.
V_6_R_1.1	1/31/2020	Steve Cross	Changed reference from surgical mask to face mask and added links in the Checklist. Changed Latex gloves to Nitrile and added a link in the Checklist.
V_6_R_1.2	3/6/2020	Stephanie Haynes, Steve Cross, Keith James	Overall document review. Modified Checklist in the travel section.
V_6_R_1.3	3/9/2020	Steve Cross	Added sections 3.4, 3.5 and 3.6. Added Zero-Day Addendum.
V_6_R_1.4	3/10/2020	Steve Cross	Moved document control to the end of the document. Edited Section 3.4. Edited Zero-Day Page.
V_6_R_1.5	3/11/2020	Justin Heinrich	Legal review.