

This policy is in direct response to the current national pandemic caused by the COVID-19 virus and shall be in effect as determined by the FirstEnergy CEO. This policy is designed to ensure the health, safety and welfare of our employees, their families and the general public.

PARTICIPATING COMPANIES

The current list of FirstEnergy companies (the “Company”) covered by this policy letter is found in Human Resources Letter 011 entitled Participating Companies and is intended to cover all Companies currently within the FirstEnergy Corp. umbrella.

ELIGIBILITY

All employees are covered by this policy.

POLICY

All employees who arrive to work for FirstEnergy must confirm their temperature is not 100.4 degrees Fahrenheit (“100.4F”) or higher through self-check prior to arriving at work, or through Company initiated testing upon the employees’ arrival to work. Employees with a temperature of 100.4F or higher shall not report to work, or if detected at work shall immediately return home, and contact their supervisor or local HR.

POLICY DETAIL

What follows are those items necessary to effectively implement this Policy.

I. Policy Detail

- a. Supervisor and Above Self-Check:** FirstEnergy requires all supervisors and above perform a daily self-check of their temperature prior to reporting to work. If employees at and above the supervisory level receive a temperature reading of 100.4F or higher, they should not report to work and should immediately contact their supervisor and/or local HR.
- b. Employee Self-Check:** All FirstEnergy employees are asked to perform a daily self-check of their temperature prior to arriving at work to ensure they do not report to the workplace with a temperature of 100.4F or higher. If any employee receives a temperature reading of 100.4F or higher, he/she should not report to work and should immediately contact their supervisor and/or local HR.

If an employee chooses to perform a self-check versus a Company-performed check, that employee may be asked verbally to verify and confirm that he/she did a self-check. The employee’s verbal verification is sufficient for Company purposes.

- c. Company-Performed Voluntary Temperature Check:** If any employee is unable to perform a self-check of his/her temperature prior to arriving at work, the employee may ask to have his/her temperature taken by the Company immediately upon the employee’s arrival to work. In such cases, a person designated by the Company to perform a temperature check will take the employee’s temperature with a no-touch thermometer and either confirm an

acceptable temperature or immediately instruct the employee to return home and contact his/her supervisor or local HR. Employees are asked to follow current social distancing guidelines while waiting for a Company-performed temperature check.

d. Employee Refusals (“Refusals”): In rare instances where an employee refuses to verbally confirm he/she performed a daily temperature self-check and also does not permit a Company-performed check, one of the following will occur:

- i. The Company may direct the employee to submit to a Company-performed temperature check; or
- ii. The Company may direct the employee to not report to work, leave Company property and immediately contact local HR.

e. Temperature Check Procedure

i. FirstEnergy Facility: Understanding there are over 200 facilities located across FirstEnergy, where practical, each facility shall do the following:

1. Limit employee entry at the start of shifts to one primary entrance to ensure employees either verbally confirm temperature self-check or obtain a temperature check at work.
2. Identify one or more management-level employees (supervisor or higher), or other appropriate personnel, for each work shift at that facility to act as the Company’s designated representative responsible for performing the necessary temperature checks (the “Designated Representative”).
3. The Company may choose to station a Designated Representative as necessary either throughout the normal workday or longer, depending on the facility (24/7 coverage at the General Office, for example).
4. For each Designated Representative, the Company will supply a no-touch thermometer as well as other appropriate personal protective equipment for this task (i.e. gloves, masks, etc.).
5. Designated Representatives should be located at the primary entrance of each facility (as defined by local management) to confirm the self-check verbally (via a simple verbal “self-check” statement) or perform the no-touch temperature check at the employee’s request.
6. In the unlikely event of a Refusal see letter d. above.
7. Designated Representatives will be provided training by the Company prior to serving in this role.

ii. Employee Reporting to Remote Company Facility or to Non-Traditional Location:

1. We are aware that many employees are asked to work from home or report to different facilities based on the unusual challenges presented by the COVID-19 virus. This section creates a reasonable policy for employees who are not reporting to a traditional Company facility:

- a. Working From Home, No Customer or Co-worker Contact: Employees working from home who will not experience customer or co-worker contact are not required to perform temperature checks.
- b. Working From Home, Reasonably-Anticipated Customer or Employee Contact: Employees working from home who anticipate customer or co-worker contact during the day, or anticipate visiting a FirstEnergy facility, are asked to either (a) perform a self-check and verify the same with their supervisor (either by email or phone), or (b) contact their supervisor for direction on how to proceed.
- c. Working From Non-Traditional Company Location: Employees working from a non-traditional company location (i.e. substation, temporary reporting location, “pod”, or other location at the direction of their supervisor), are asked to either (a) perform a self-check and verify the same with their supervisor (either by email or phone), or (b) contact their supervisor for direction on how to proceed. In cases where employees contact their supervisor, supervisors may choose to direct their employees to a Company location at the start of their shift for purposes of a Company-performed temperature check.
- d. Employees arriving in off-hours: Employees who are arriving outside of a 30-minute window prior to and after their normal start time should contact their supervisor by phone to obtain direction on how to proceed. Important: Employees without a temperature check should not enter the work facility.

II. Timing: This policy will go in effect immediately upon the Company securing and deploying sufficient materials to allow for Designated Representatives to perform the duties described above. Your local leadership team will notify you when the policy is in effect as times may vary from one Company location to another.

III. Legally Mandated Temperature Checks: Should relevant law change to mandate that the Company, as an employer, take employee temperatures, the Company will issue an amended policy with specific instructions for employees.

CLARIFICATION

Questions concerning the interpretation or administration of this policy should be referred to the local human resources representative or the Manager, Corporate Health & Safety or the Employee Relations Section of the Human Resources Department.

This policy is not a binding contract, but a set of guidelines for implementation. The Company explicitly reserves the right to modify any of the provisions of this policy at any time and without notice.

In an effort to answer questions that can be reasonably anticipated from the implementation of this policy, the following “Q&A” has been created.

Q: Can my employer legally take my body temperature?

A: Yes. The Equal Employment Opportunity Commission recently published its opinion on this topic in a guidance updated on March 19, 2020. The guidance states as follows: “. . . if pandemic influenza becomes widespread in the community as assessed by state and local health authorities or the CDC, then employers may measure employees’ body temperature.” (https://www.eeoc.gov/facts/pandemic_flu.html#q6).

Q: What if I want to perform a self-check but do not have a thermometer?

A: With approval by the employee’s immediate supervisor, the Company will reimburse all employees for the reasonable cost of one thermometer (with the presentation of a receipt) for the purposes of performing a self-check at home.

Q: Will the Company be keeping my temperature information as a result of this new policy?

A: No. The only information the Company intends to obtain, when circumstances dictate, is whether or not your temperature is 100.4F or higher. The Company will not be keeping records of who confirmed a self-check, who submitted to a company-performed check, or what employees’ temperatures were. The Company is interested only in confirming that those employees entering the workplace are below the threshold level of 100.4F.

Q: Is this all necessary?

A: Yes, current information from health professionals and organizations indicates that employers must take measures to ensure their employees do not work while sick and increase the potential for transmission of COVID-19. Employers are strongly encouraged to check temperatures for those employees who do not perform a self-check.

Q: I know contractors work on our property; how can I ensure that contractors are as safe as me when it comes to taking their temperature?

A: FirstEnergy has been working with its individual and corporate contractors to ensure they have a policy consistent with this Human Resource Letter. FirstEnergy fully expects all contractors working on FirstEnergy property to take the same precautions regarding body temperature as its own employees. If employees suspect a contractor working on FirstEnergy property is not in compliance with this policy, that employee should report their concern to their immediate supervisor.