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COVID-19 LEVEL 4 LOCKDOWN RISK ADJUSTMENT PLAN AND PROTOCOL

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INTRODUCTION

The following DFO Covid-19 Level 4 Lockdown Risk Adjustment Plan and Protocol ("Protocol") will apply to all staff from the reduction of the current 'hard' Level 5 lockdown to a Level 4 lockdown. Should any of the regions in which DFO have offices, not be reduced to a Level 4 lockdown, the current provisions applicable to a Level 5 lockdown will continue to apply (subject to appropriate amendments by firm management).

This Protocol aims to spell out the primary rules of engagement for firm staff during the Level 4 lockdown. As such it is not complete or final, and will be complemented, amended and updated from time to time by firm management as necessary and required. Staff must ensure that they remain up to date with all further iterations of the document and comply with the provisions thereof.

Should the Level 4 lockdown be reduced or escalated, firm management will communicate any changes to the Protocol with staff.

Under the Level 5 lockdown all staff were required to remain at home. Under the Level 4 lockdown, the firm can resume operations, subject to strict restrictions as set out in this Protocol. Accordingly, the special Covid-19 Work From Home Leave that applied during the Level 5 lockdown will terminate at the end of the Level 5 lockdown and staff will be required to be fully operational (whether at home or at the office) according to the normal working hours of the firm and this Protocol.

Clients must experience the firm as being fully operational in all respects and staff and departments must do all that is necessary, subject to this Protocol, to ensure the full functionality of the firm and staff. This may require workarounds and adjustments and staff are encouraged to assist and help in any way possible. We ask that you keep an open mind, that you bear with us as new procedures and technologies are implemented, and that you do your best to ensure that our clients know we care for them and are ready to help in any way possible.

We also ask that staff do their utmost to remain healthy and safe and adhere to the firm's health & safety protocols and procedures.

OCCUPATIONAL HEALTH & SAFETY MEASURES

Staff are made aware of the directive issued by the Department of Labour on 29 April 2020 which requires health and safety measures to be complied with at workplaces. This directive can be accessed online at <http://www.labour.gov.za/DocumentCenter/Regulations%20and%20Notices/Notices/Occupational%20Health%20and%20Safety/Final%20OHS%20Covid19%20Directive%2028%20APRIL%202020.pdf>

and will remain applicable for as long as the declared national disaster due to Covid-19 remains in force.

DFO undertakes to in accordance with this directive provide and maintain as far as reasonable practical, a working environment that is safe and healthy for staff, and will take the steps and implement the procedures outlined in this Protocol to eliminate or mitigate the hazard of the Covid-19 virus at firm offices. DFO will also take the necessary steps outlined in this Protocol to ensure that clients and visitors to firm offices are not exposed to hazards or present a hazard to others.

LEVELS OF LOCKDOWN

Government has introduced a Covid Alert system based on five levels of lockdown. The alert system as managed by the National Coronavirus Command Council will determine the relevant level of lockdown for a Province or region based on the current rate of transmission and the capacity of the health system to provide care for infected persons. As such levels can move up or down depending the relevant level determined by the Command Council.

The five levels of lockdown can be summarized as follows:

Level 5	Full lockdown with drastic measures taken to prevent the spread of the virus.
Level 4	Some activity allowed to resume subject to extreme precautions required to limit transmission and outbreak.
Level 3	Easing of some restrictions, including on work and social activities, to address high risk of transmission.
Level 2	Further easing of restrictions, but the maintenance of physical distancing and restrictions on some leisure and social activities to prevent resurgence of the virus.
Level 1	Most normal activities can resume with precautions and health guidelines followed.

CURRENT LOCKDOWN LEVEL

Government has announced a reduction of the Level 5 lockdown to Level 4 as of 11:59 pm 30 April 2020. This concomitant reduction will allow DFO to commence operations under the Level 4 lockdown, subject to stringent restrictions and in accordance with Government regulations.

PRIMARY LEVEL 4 RESTRICTIONS

The following primary restrictions applicable to DFO and staff for Level 4 lockdown have been announced as part of Government regulations applicable to a Level 4 lockdown:

- National curfew from 20:00 pm to 05:00 am applicable to everyone except essential service workers travelling to and from work. This means all staff who do not qualify as essential service workers must remain confined to their residence during this time.
- Movement to the office for work can only be done if staff members have the necessary permit. Such permits which will be provided to staff by the firm and staff must at all times have their permits with them when travelling to and from work together with the necessary identification documentation.
- If possible staff must work from home and staff should stay home as far as possible with staff working from offices limited to only essential staff.
- Wearing of face masks is mandatory at all times.
- Hygiene and social distancing remain of critical importance.
- Sanitizing when entering and leaving the workplace.
- Covid-19 screening must take place when entering workplaces for staff and clients/visitors.
- No social gatherings are allowed.
- No meetings of more than 10 persons are allowed subject always also to appropriate social distancing and preventative measures.
- Public transport is allowed subject to limitations on the number of passengers that can travel.
- No travel to and from workplaces during weekends.
- No local or inter-provincial travel, except in support of essential service operations allowed under Level 4 lockdown.
- No international travel.

REQUIREMENTS FOR OPENING OF FIRM IN LEVEL 4 LOCKDOWN

Government requires all businesses to address the following three aspects as part of their Covid-19 Health & Safety Protocols for a Level 4 lockdown:

- 1. Health & Safety**
- 2. Disease Prevention**
- 3. Disease Surveillance**

Hereafter we set out how DFO will apply these aspects and require all staff to comply with the following operational and health & safety procedures and protocols to ensure that the firm is compliant with and meets the Government regulations in respect of a Level 4 lockdown:

HEALTH AND SAFETY PROTOCOLS

1. Firm Covid Compliance Officer

- 1.1. Ingrid Gaertner is the firm's appointed Covid Compliance Officer responsible for dealing with Covid-19 health & safety management at firm offices. He/she is supported by Sonja Nel.
- 1.2. Staff can direct any queries to the Covid Compliance Officer and he/she will keep you informed of developments or changes to this Protocol.
- 1.3. The Covid Compliance Officer will monitor the risk situation at the firm as well as possible infections by staff and keep management informed of compliance by staff with this Protocol as well as inform staff of any changes to this Protocol.
- 1.4. Staff can also make contact with the Covid Compliance Officer for information about Covid-19 who will also help ensure that staff remain informed on aspects such as health & safety measures, personal hygiene, social distancing, use of masks, cough etiquette, screening and testing.
- 1.5. The Covid Compliance Officer will inform the Department of Health and the Department of Labour of any staff member that has been infected and will review the cause of such infection and whether any amendment to this Protocol should be made to reduce the risk of infection.

2. Working Arrangements

- 2.1. In accordance with the directive, the firm is required to as far as possible minimize the number of staff at the office looking at Work From Home, shift work, staggered working hour and other measures to achieve the necessary social distancing. The firm and Practice Groups have investigated the various options and will implement work protocols with staff in accordance with this.
- 2.2. Work protocols will continuously be reviewed to ensure compliance by the firm with the directive and to allow maximum operating efficiency as well as limit the risk to staff that may be over 60 or have health issues or comorbidities or any condition making them high risk.
- 2.3. Should any staff member be unable or concerned about performing any work activity, they should address their concerns with their line manager, who will, if such cannot be resolved, escalate such to the Covid Compliance Officer, and thereafter to Day Com, should the matter need management direction.
- 2.4. Staff must also inform the Covid Compliance Officer without delay if they suffer from health issues or comorbidities or any condition which they believe may place them at a higher risk of complications or death should they become infected.
- 2.5. Department heads will engage with staff required for Office Based Working to ensure a phasing in of staff at the office as of the re-opening of firm offices. All such phasing in will be monitored and recorded by the Covid Compliance Officer.
- 2.6. Office Based Working staff will be arranged into the following categories:
 - 2.6.1. High Risk Staff – reception, cleaners, messengers. The necessary Personal Protective Clothing will be provided to such staff by the firm.
 - 2.6.2. Medium Risk Staff – staff that may engage with clients and visitors from time to time or may travel externally to clients or perform work functions externally. Face masks and facilities that provide appropriate screening and have been sanitized will be availed to such staff.
 - 2.6.3. Low Risk Staff – staff that engage on a limited basis with clients and visitors and are generally not required to travel outside of the office. Face masks and facilities that provide appropriate screening and have been sanitized will be availed to such staff.

3. Office Opening Hours

- 3.1. Firm offices will re-open as of Monday 4 May 2020 subject to the provisions contained in this Protocol. This includes the King Williams Town, Gonubie and Umtata branches.
- 3.2. The offices will be open from 08:00 to 16:30 during the week. The offices will close at 16:30 sharply and will remain closed until opened at 08:00 the next day. No staff will be allowed in any building after 16:30 and before 08:00 the next morning, except essential firm staff with permission.
- 3.3. Offices will be closed from 16:00 on Friday afternoons till 08:00 on Monday mornings and no staff will be allowed in any building over weekends, except essential firm staff with permission, Staff should accordingly make the necessary arrangements to take work or files with them if they plan to work over weekends.
- 3.4. Opening and closing of the respective buildings will take place in accordance with existing Locking/Unlocking protocols.

- 3.5. All necessary steps have been taken to prepare the firm offices for Office Based Working staff to return to in accordance with their department requirements.

4. Where Staff Will Work

- 4.1. Each departments must determine which staff must:

- (1) Work From Home
- (2) Office Based Working

Such determination may be changed by a department head dependent on operational circumstances, subject at all times to this Protocol.

5. Work From Home

- 5.1. Staff that are designated to Work From Home by their department head, will be required to primarily work from home and limit office visitation as much as possible, taking into account operational needs.
- 5.2. Work From Home staff remain subject to the normal working hours of the firm and operational requirements of their respective departments.
- 5.3. Work From Home staff will be permitted to visit their offices, subject to the provisions of this Protocol, to attend meetings, obtain documents and resources and attend to necessary operational requirements. Social or informal visitation must be avoided. The duration of any office visitation must also be limited with staff returning home immediately following the completion of their operational duties.
- 5.4. Work From Home staff may be required to attend internal or client meetings, subject always to the provisions of this Protocol, and staff must avail themselves to attend such meetings where required to attend.
- 5.5. Work From Home staff operations and duties will be coordinated by each department and staff are required to align themselves with such duties and responsibilities and execute such to the best of their ability. Client service, responsiveness, availability and quality of work remain paramount and Work From Home staff are required to meet and exceed (where possible) these demands at all times. Working from home may not be used as an excuse for poor productivity, quality of work, engagement or availability.
- 5.6. Work From Home staff, may also be organised by their department to have periods of Office Based Working in shifts or on certain days. Any such arrangements will be coordinated with staff from time to time as operational needs may require, and all such working arrangements will remain subject to this Protocol.
- 5.7. The accessibility of staff to effectively Work From Home will be assessed by each department head with technical support being provided where possible by the firm to assist with remote working capability of staff. DFO will explore additional functionalities, software and other tools that may assist staff that Work From Home to complement their capabilities, and such will be communicated from time to time to staff.
- 5.8. Work From Home staff that attend video conferencing meetings with other staff and/or clients will be required to be neat and appropriately dressed for such meetings as if such meetings were held at the office. It is vital that professionalism and 'business as usual' is upheld with staff that Work From Home.

6. Office Based Working

- 6.1. Staff that are designated by their department to work primarily at the office, even if on shift or separate rotational days (as may be applicable) will be subject to all the requirements in this Protocol that relates to Health & Safety at our firm offices.
- 6.2. Unless, designated to work in shifts or on separate days, normal working hours will apply to Office Based Working staff, taking into account the provisions of the firm policy on Flexible Working Hours for professional staff which will continue to apply to qualifying professional staff that perform Office Based Working.
- 6.3. Staff designated as Office Based Working staff may not unilaterally decide to Work From Home without the approval of their department head and without the necessary technical arrangements having been made to allow the staff member to be fully operational at home.
- 6.4. Office Based Working staff operations and duties will be coordinated by each department and such may need to complement staff that Work From Home to ensure that each department and the Practice Group is able to provide a 100% service to the firm and clients. Office Based Working Staff are required to align themselves with such duties and responsibilities and execute such to the best of their ability.
- 6.5. Office Based Working staff should limit their movements within and outside the office areas as much as possible. External movement to public areas (for example during lunchtime) is discouraged and should be done with circumspection. External travel during working hours should as far as possible be limited to travel for necessary client visitation and work purposes.

7. Office Access, Screening and Sanitization

Reception staff will be provided with Covid-19 screening kits to screen all staff, clients and/or visitors entering and leaving firm offices on the following basis:

7.1. *Clients/Visitors*

- 7.1.1. Clients/visitors will be screened for symptoms when entering any firm office.
- 7.1.2. Clients/visitors will be required to wear a face mask and to sanitize their hands with a sanitizer that will be available at main access points upon entering and leaving the office.
- 7.1.3. Clients/visitors should keep a distance of 1.5 meters apart when waiting for screening to be completed. Where possible, floor markers will be displayed at entrances to indicate appropriate distances.
- 7.1.4. If a client/visitor does not have a face mask, it will need to be ascertained if such is a client of the firm or a mere visitor. If a visitor, access may be denied until such visitor can obtain a mask or appropriate face covering. If person is a firm client, and the client is not able to obtain a mask or appropriate face covering, reception will provide a disposable mask to the client.
- 7.1.5. If a client is screened and tests positive for a high temperature or other recognisable virus symptoms, the Covid Compliance Officer must immediately be informed. The client should also be informed of the positive test and be requested to remain in the reception area away from any other clients or staff. The Covid Compliance Officer will enquire from the client whether the purpose of the visit is of short duration (eg. sign documents) or for a consultation or longer meeting. The Covid Compliance Officer will also assess the risk level of the client (Low = just a temperature, High = sneezing and coughing or other symptoms) and will also obtain the necessary tracing information from the client.

- 7.1.5.1. If the visit is of short duration and the risk appears low, staff members engaging with the client should be informed of the positive test and that extreme precaution should be used when engaging with the client. Surface sanitizing should be conducted immediately after the client has left.
- 7.1.5.2. If the visit is for a consultation/longer meeting and the risk is low, the relevant staff member should be informed of the positive test and discuss with the client whether an alternative arrangement cannot be made eg. video conference, rather than a physical meeting. It remains the relevant staff member's decision to assess the importance of the client's visit and whether such should continue or not. If it does continue, extreme precaution should be used when engaging with the client. Surface sanitizing should be conducted immediately after the client has left.
- 7.1.5.3. If the client risk appears high irrespective of the reason or length of visit, the Covid Compliance Officer will inform the client that they appear to be a high risk for infection and that alternative arrangements will be made with the client by the relevant staff member. The necessary discretion will need be applied to try and assist the client but also protect staff from a potential high risk client and if necessary further access by the client to the office may be refused.
- 7.1.6. Appropriate signage/posters will be displayed at reception areas indicating firm protocols and right to refuse access for non-compliance or potential infection.
- 7.1.7. Staff should as far as possible maintain a distance of 1.5 meters from clients or visitors and ensure that all necessary health & safety measures are maintained.
- 7.1.8. If necessary due to the volume of visitors/clients which will compromise the ability to apply the necessary social distancing within firm offices and breach the requirement of one person per 1.5m², the Covid Compliance Officer will arrange restrict/limit the number of persons entering offices at a time to enable the necessary social distancing to be applied inside offices. This will be done with circumspection and dignity towards visitors/clients.

7.2. *Firm Staff*

- 7.2.1. Firm staff will be screened when entering any firm office for the first time in the day. Such screening will assess whether staff have any of the observable symptoms associated with COVID-19, namely fever, cough, sore throat, redness of eyes or shortness of breath (or difficulty in breathing). Staff must also report whether they suffer from any of the following additional symptoms: body aches, loss of smell or loss of taste, nausea, vomiting, diarrhoea, fatigue, weakness or tiredness; and staff will be required to inform the Covid Compliance Officer should they start experiencing any of these symptoms during the day while at work.
- 7.2.2. It is vital that each staff member ensures that they are screened once a day by reception staff, irrespective of their entry point. Reception staff will maintain a register of staff screening per day and staff must ensure compliance with the firm's screening regime.
- 7.2.3. To assist with staff screening in the morning, the following timeframes are recommended for staff to adhere to in order to avoid queuing:
 - 7.2.3.1. Screening will commence from 08:00 with the opening of the offices.
 - 7.2.3.2. Property staff should as far as possible arrive at offices at around 07:30 for screening.
 - 7.2.3.3. Other staff should present themselves for screening from around 08:00 for screening.

- 7.2.3.4. No entry will be allowed without screening. If a staff member enters the building before reception staff are available to screen, it remains the staff member's responsibility to have themselves screened the moment reception staff are available to screen.
- 7.2.4. Firm staff must ensure they sanitize their hands at any time when entering or leaving with a firm sanitizer that will be available at main access points upon entering and leaving the office.
- 7.2.5. Firm staff must wear a clean face mask to the office. Non-disposable face masks must be washed daily to avoid infection.
- 7.2.6. Staff should keep a distance of 1.5 meters apart when waiting for screening to be completed. Where possible, floor markers will be displayed at entrances to indicate appropriate distances.
- 7.2.7. If a staff member is screened and tests positive for a high temperature or shows symptoms associated with Covid-19, the Covid Compliance Officer will immediately be informed. The staff member should also be informed of their symptoms and be requested to remain in the reception area away from any other clients or staff and wear their face mask. The Covid Compliance Officer will enquire from the staff member the necessary tracing information before requesting the staff member to go directly home and arrange for testing. The Covid Compliance Officer will also inform the relevant department of the staff member that screened positive for symptoms and ensure that the area is disinfected and take all other appropriate measures to reduce the risk of transmission.
- 7.2.8. A staff member that screened positive will not be allowed to return to work without a certificate confirming that the staff member has not contracted Covid-19 or has recovered from such infection. Such staff member will be closely monitored on return for symptoms of infection. A staff member will be placed on paid sick leave, unless arrangements can be made to allow the staff member to Work From Home where possible.

8. Reception Areas

- 8.1. Reception staff will be provided the necessary Personal Protective Equipment and protective screens needed to perform their duties towards clients, visitors and staff.
- 8.2. As high risk exposure staff, all staff must support reception staff and assist them to maintain health & safety in all reception areas.
- 8.3. Reception seating for clients will be organised/restricted to allow for safe seating distances between clients/visitors.
- 8.4. No hospitality services (eg. tea, coffee, cool drinks) will be provided to clients/visitors. Only bottled water can be provided on request to clients/visitors. Only the bottle will be provided without any glass.
- 8.5. Sanitizers and bins will be available in all reception areas for safe disposal of items.
- 8.6. High risk reception and public areas will be regularly wiped and disinfected by cleaning staff.

9. Consultation Rooms and Boardrooms

- 9.1. Sanitizers and bins will be available in all consultation rooms and boardrooms for safe disposal of items.
- 9.2. Consultation rooms will have transparent protective screens on the table to allow seating on opposite sides of consultation tables.

- 9.3. Consultation rooms will be wiped and disinfected by cleaning staff after each consultation.

10. Cleaning Staff

- 10.1. Cleaning staff will be provided with the necessary Personal Protective Equipment in order to fulfil their cleaning duties.
- 10.2. Cleaning staff duties will be reprioritized to health & safety cleaning and disinfecting with a focus on public accessible areas and bathroom cleaning. This will impact on the frequency and capability of cleaning staff to clean personal offices and other non-public accessible areas. Consideration and assistance to cleaners to keep these areas clean and neat is required.

11. Building Floors

- 11.1. Hand sanitizers and bins will be available on each floor for staff to regularly use and dispose of potentially infected items.
- 11.2. Staff are encouraged to wash their hands properly after bathroom visits or kitchen use and to regularly sanitize their hands when moving around the firm office or engaging with other staff, clients or visitors.

12. Wearing of Face Masks

- 12.1. It is compulsory for all staff to wear a face mask at all times when leaving or returning to their homes.
- 12.2. The firm will provide each staff member with two cloth face masks to use for work purposes when commuting to work and during any work operations at the office or externally. Priority in the provision of face masks will be given to staff required for Office Based Working.
- 12.3. It is each staff member's responsibility to ensure that their face masks are washed, dried and ironed after daily use. Should any staff member not be in a position to do this, they can contact the Covid Compliance Officer to help make arrangements for this.
- 12.4. A face mask must remain on the face for the whole day, and may only be removed in a personal office where only the wearer is present. In any space where more than one person is present all persons must wear their face masks continuously.

13. Personal Offices

- 13.1. Office Based Working staff that have a personal office, are primarily responsible for the health & safety of that office. This requires that such staff member take responsibility for:
- 13.1.1. Sanitizing of surfaces daily.
- 13.1.2. Not sharing office equipment or items with other persons that have not been appropriately sanitized.
- 13.1.3. Keeping of office neat and tidy.
- 13.1.4. Ensuring any person entering the office meets the requirements of this Protocol such as wearing a face mask, keeping the necessary distance etc.
- 13.1.5. Meeting all other firm requirements relating to health & safety as well as security of equipment, files and information.

- 13.1.6. If any staff member requires support or guidance with sanitizing or cleaning of their office or work space, they must contact the Covid Compliance Officer.

14. Printers, safes and other general use items

- 14.1. Where possible, sanitizers will be provided at general use equipment such as printers, and staff should ensure they sanitize following use thereof.
- 14.2. Where sanitizers are not available, staff should make use of floor sanitizers on a regular basis when using general office use items or moving in general office use areas, such as safes.

15. Kitchens

- 15.1. The use of the kitchen areas are discouraged as these areas present close-contact areas that should rather be avoided. Care should be taken to limit time in kitchen areas and to ensure that staff leave kitchen areas clean and neat at all times.
- 15.2. If used, only one person at a time may be allowed in kitchen areas. Staff, should as far as possible bring their own food and drink and retain such with them at their desks.
- 15.3. No takeaway deliveries will be allowed or accepted at reception areas. Office Based Staff should avoid any such ordering of food while at the office.
- 15.4. Hands should be washed or sanitized before using any kitchen equipment or cutlery and after such use.
- 15.5. Staff should also bring a personal cup/mug for their use and ensure they personally wash such and take such with them.
- 15.6. The firm may implement a use schedule of kitchens should it appear that staff are not adhering sufficiently to these directions on kitchen use.

16. Break Times

- 16.1. Staff must adhere to social distancing during break times and as far as possible avoid unnecessary engagement with other staff during break times. Not sharing of food, drink, cigarettes or other items is allowed.
- 16.2. The firm may implement a schedule of staggered break and kitchen use times should it appear that break times present an increased risk for social distancing to be disregarded.

17. Bathroom Use

- 17.1. Bathrooms present high-risk areas and staff are advised to as far as possible minimize bathroom visits during the day. Cleaning staff will regularly clean and sanitize bathroom areas.
- 17.2. The number of persons in any bathroom area should be limited to ideally only one person at a given time.
- 17.3. Hands should be washed or sanitized before and after bathroom use.
- 17.4. The firm may implement a queue system for bathroom use should it appear that staff are not adhering sufficiently to these directions on bathroom use.

18. Meetings and Consultations

- 18.1. As far as possible, all meetings, discussions and/or consultations (jointly referred to as “meetings”) should primarily be conducted via video conferencing or telephone conferencing. Physical meetings are discouraged as far as possible. Clients should also be requested to utilise video or telephone conferencing, with physical meetings to be held only where required or appropriate for the type of meeting/work or if required by the client.
- 18.2. Even staff meetings or discussions should as far as possible be conducted via video or telephone conferencing, even if staff are present in the office. This will assist with limiting physical contact and reduce the risk of infection that escalates where multiple persons are present in an enclosed space.
- 18.3. Should physical meetings take place in an office or consultation room/boardroom, it is vital that a distance of at least 1.5 meters are maintained between all persons and that all persons wear face masks and sanitize their hands before and after the meeting. In any event, no meeting may be held or attended by more than 10 persons being physically present.
- 18.4. No physical contact between persons attending a meeting (eg. handshake) is allowed and any passing of documentation between persons should be conducted with care and with the necessary sanitization of documents and hands.
- 18.5. Should any meeting be conducted or attended whether at the office or outside the office (eg. at a client office or advocates chambers) that does not comply with the provisions of this Protocol for meeting health & safety, persons having attended such a meeting must immediately following such meeting notify the Covid Compliance Officer of the meeting, number of persons present, and extent to which the meeting did not comply with health & safety protocols. If possible attendance of any meetings which are not compliant with health & safety protocols should be avoided. Professional staff should also prior to meetings outside the office enquire whether meetings will meet basic health & safety protocols and encourage meeting organisers to ensure that the necessary health & safety protocols are applied to the meeting.

19. Travel Restrictions

- 19.1. During the current lockdown level, no travel outside of a Province is allowed, unless strictly in accordance with Government regulations and with necessary permits. All instances of travel outside of a Province must be approved in advance.
- 19.2. Any travel in the Eastern Cape must be in accordance with Government regulations and with the necessary permits.
- 19.3. Should any staff member make use of the allowance to travel between Provinces in order to return to their residence or work, then the Covid Compliance Officer must be contacted to make the necessary arrangements for such travel, including that the staff member may be required to self-isolate and Work From Home for a period of time before they are allowed to come to any firm office, should they travel from a high-risk region.

20. Firm Vehicles

As far as possible staff should limit their use of these vehicles.

A sanitizer will be provided when obtaining the keys for a car. The sanitizer must be used to wipe down touch surfaces in the car when entering the vehicle and when returning the vehicle. The sanitizer must be returned with the car keys. The cost of replacing a sanitizer not returned will be allocated to the staff member who failed to do so.

No more than two persons may be present in any firm vehicle at any time and face masks must be worn for the duration of travel by all persons in the vehicle.

21. Finance and Compliance Arrangements

- 21.1. Given the complexity of having staff at home and at the office, adjustments to current procedures may be required to ensure that work is done effectively but without increasing risk of fraud, hacking, cyber attack, poor regulatory compliance etc.
- 21.2. Firm management and managers may accordingly from time to time circulate new or amended operating procedures during the period of the lockdown and staff are requested to comply in full with such procedures and without delay.

22. General Hygiene and Social Distancing

- 22.1. Irrespective of whether staff Work From Home or conduct Office Based Working, they must practice good hygiene and meet all Government Covid-19 safety requirements as well as practice social distancing at all times. It remains each staff member's personal responsibility to take all the necessary personal preventative measures to keep his/her family, colleagues and clients safe during the period of lockdown.
- 22.2. If staff moved externally or arrive home from Office Based Working it is important to undertake the following preventative measures:
 - 22.2.1. Avoid physical contact with any person.
 - 22.2.2. Wash hands thoroughly.
 - 22.2.3. Wipe down and clean your car touch areas, keys, handbag/wallet, phone and other personal items taken to the office.
 - 22.2.4. Redress in clean clothes and wash clothes worn.
 - 22.2.5. Wash cloth face mask for use the next day.

23. Infection

- 23.1. Should any staff member believe they are infected, they should not come into the office and immediately inform the Covid Compliance Officer that he/she believes they may be infected.
- 23.2. Should the staff member be at the office when they feel ill or show symptoms associated with Covid-19, the staff member should immediately inform the Covid Compliance Officer.
- 23.3. In all cases of possible infection, the staff member should remain at home/immediately go home, provide the Covid Compliance Officer with the necessary tracing information and arrange for testing to determine their status and keep the Covid Compliance Officer informed of their status.
- 23.4. The Covid Compliance Officer will inform the relevant department of the potential infection as well as further updates on the status of the employee. Where the employee was at work, the Covid Compliance Officer will also inform the relevant department of the staff member that showed symptoms and ensure that the workstation area of the staff member is disinfected and all other appropriate measures to reduce the risk of transmission is taken.
- 23.5. A staff member will not be allowed to return to work without a certificate confirming that the staff member has not contracted Covid-19 or has recovered from such infection. Such staff member will

be closely monitored on return for symptoms of infection. A staff member will be placed on paid sick leave, unless arrangements can be made to allow the staff member to Work From Home where possible.