Staples, Inc.

[Office]

Business Continuity Plan (BCP) / Continuity of Operations Plan (COOP)

TEMPLATE

2019

REDACTED FOR PUBLIC POSTING

In the event of a disaster situation, please refer to the Immediate Actions on the next page.

IMMEDIATE ACTIONS IN A BUSINESS INTERRUPTION

1.1. Prepare when a Known Hazard is Coming (eg Hurricane)

Some incidents give advance warning, like hurricanes. This section has short, action-oriented steps for all organizations, with regards to the first few days. ***Please refer to the Crisis Management Plan.***

Step	When	Action	Owner
1	Pre-Hurricane Season (June)	Distro List updates. • Facilities Management team updates their distro list for hurricane alert notifications. • Supply Chain updates the list of functional area captains (below)	Facilities Mgmt/ Supply Chain
2	5+ Days Prior to Specific Storm	Facilities Management sends email that an event is imminent	Facilities Mgmt
3	5+ Days Prior to Specific Storm	All Functional Captains alert the necessary people in their areas and begin to action their preparedness check-lists	All Functional Captains
4	Standing meetings are immediately set up to bring the necessary functions together on a call at least once per day		
a.	5+ Days Prior to Specific Storm	US Retail Call *(see Key Partners list for attendees)*	US Retail leads set-up of the call
b.		NAD Call *(see Key Partners list for attendees)*	Supply Chain leads set-up of the call
c.		Corporate Call *(see Key Partners list for attendees)*	Corporate Communications leads set-up of the call
5	2-3 days prior to a storm, during and after as needed	Updates to leadership are provided via email or phone if decisions are needed	Supply Chain
6	2-3 days prior to a storm, during and after as needed	Updates to leadership are provided via email or phone if decisions are needed. 1. **Associates** - proactive close? Pay all scheduled workers? Set status update & associate accountability rhythm (who's accounted for / not / needs help), eg 1-2/day 2. **Community** - set total donation amount. (tell Comms, Sales, Supply Chain) 3. **Customers** - set up disaster coupon for impacted SBA customers?	Facilities email & exec call
7	Before/after storm hits	Document findings and update key partners.	Supply Chain, Facilities
8	After storm hits	Review disaster pamphlet/emails for customers, and get financial approval for coupon code or other customer benefit.	Retail Marketing
9	After response	Hotwash - quick review of how things went (worked well, improve for next time) > capture lessons learned	Business Continuity

1.2.   Procedures for Business Continuity Plan Activation

This phase can often be chaotic and good information can be hard to find. Keep calm, work systematically, and be prepared to revisit early decisions when new information is available.

#	Action/Discussion Item
Initial Checklist	
#	**Action/Discussion Item**
1	**Assess scenario and impact.** Get up to speed with the person(s) reporting it: • Summary of situation – what happened? • Who has done what so far? • Impact on people, facilities, operations, customers
2	**Life and safety focus**. Are there any urgent life/safety issues? Secure damaged facility for safety.
	Take care of our employees. • Employee accountability: Start the process for accounting for our people, asking what help they need, and offering assistance. • Payroll: start process for special payroll processes for paying associates in impacted area.
3	**Identify Impacts.** Personnel, Critical Functions, facilities, technology, vendors.
4	**Set up daily Staples Inc. calls.** Focus on associates, operations, facilities, community. • Supply Chain will set up the calls. Attendee list maintained in Crisis Plan.
5	**Set up daily Retail calls.** • Impacted Retail RVP leads the calls. Attendee list maintained in Crisis Plan.
6	**Work with Communications.** Communications will lead all internal and external communications, in accordance with Crisis Communications Plan.
7	**Documentation.** • Facilities team will provide regular Situation Reports to key stakeholders, by email. • Business Continuity Manager will maintain documentation from the response, for lessons learned.

TABLE OF CONTENTS

REVISION HISTORY

The table below summarizes information regarding the latest updates made to this plan and appropriate approvals provided.

Date	Author	Description of update

PLAN BODY

2. Plan Overview

2.1.   Security and Privacy
This plan is classified in accordance with Staples' Privacy Information Management (PIM) as "**Private**."

2.2.   Purpose
The purpose of this document is to serve as a guide for business units to continue Critical Functions during a serious adverse event. This plan addresses short-term and extended business disruptions, and identifies key elements in the Business Continuity Management System (BCMS) program.

2.3.   Scope
This plan is limited in scope to business continuity planning, response, and recovery to ensure the continued function of the Critical Functions. This plan is developed and executed in parallel with a number of related plans, but the following are *NOT* in scope for this plan, though they are part of the overarching Business Continuity Program and are available to Staples responders through the internal portal.

- Disaster Recovery Plans for each of the critical supporting applications and supporting infrastructures that are identified in this plan (Staples IT maintains and tests DRPs).
- Crisis Management Plan to address crises that require direct executive involvement (Business Continuity maintains the CMP). See Appendix 13.
- Crisis Communications Plan for communication internally and externally in a crisis. (Global Communications maintains the CCP.) See Appendix 13.
- Emergency Response Plans for warehouses (Supply Chain maintains the ERPs).

2.4.   Objectives
Through an established BCP, every effort will be made to present a clear course of action to accomplish the following objectives:

1. **Protect human life** – Provide for the safety and well-being of employees, contractors and visitors.
2. **Return to normal business** operations as soon as possible, and minimize financial loss.
3. **Limit the magnitude of unnecessary loss** of physical assets and intangible assets like reputation.
4. **Reduce any conflict, confusion and indecision** through preparation and education.
5. **Establish priorities** with regards to Critical Functions.
6. **Maintain the confidence** of stakeholders and employees, protect the Staples Brand.

2.5.   Guidance
This plan was created in alignment with the international standard for business continuity, International Organization for Standardization (ISO) 22301: 2012 and other business continuity best practices such as the Disaster Recovery Institute (DRI) 10 Professional Practices for Business Continuity Practitioners.

2.6.   Assumptions
1. Normal staffing may become unavailable as a result of the disaster. Therefore, recovery of critical functions may have to be initiated with a minimum number of personnel.   Business Continuity Teams should consider strategies to deal with loss of key personnel.
2. Off-site storage facilities and materials are intact and these materials can be transported where they are needed in the required timeframe.
3. Business Unit senior managers are responsible for the safety of their employees.
4. Business Continuity Team members have basic knowledge of how to perform critical functions.

5. Business Continuity Teams (working with the Global Technology Disaster Recovery Team) are responsible for restoring critical functions.

3. Critical Capabilities

3.1. Critical Functions

Critical functions and supporting resources were determined during a Business Impact Analysis (BIA). For more detail on the critical functions, please refer to Appendix 2. For more information on the BIA and risk assessments, please refer to Appendix 6.

3.2. Critical Technology

In order to conduct the above Critical Functions, most functions rely to some degree on technology. *For a list of critical technology that supports the critical functions, please refer to Appendix 4.*

4. Business Continuity Team (BCT)

Each business unit has a Business Continuity Team (BCT), which is responsible for the following tasks as they relate to their respective critical functions:

- Managing/organizing immediate response to an incident
- Providing operational support
- Determining which recovery strategies and procedures need to be executed
- Coordinating the execution of those tasks
- Communicating with other business continuity teams (where interdependencies exist) and CMT

The table below has a description of key business continuity team roles referenced throughout this plan and *Appendix 3* lists the Business Continuity Team and their contact information.

| Stage	BC Team Roles and Responsibilities
All	**Leader** • Decision-making authority during a disaster • Communicates the updates, status, and/or any issues periodically to the CMT Manager • Communicates direction, strategies, and next steps to the personnel • Leads team through disaster response, business recovery, and resumption activities • Owns the BCP **BC Team** • Identifies critical personnel available • Communicates updates, status, and/or any issues to the Leader • Assist the business unit personnel in the execution of the strategies, and next steps provided by the Leader
Response	BC Leader & Team upon activation the BC Plan: • Determines the magnitude and estimated length of the disruption • Assesses and prioritizes specific issues • Understands the impacts to personnel and key third parties • Identifies a recovery strategies to address these issues from both a short-term and long-term perspective, as necessary

Stage	BC Team Roles and Responsibilities
Recovery	BC Leader & Team once the response stage is complete: • Activate the BCP for facilities, technology, vendor, dependent process and/or personnel impact, as applicable • Communicates temporary work location assignments to all personnel, as applicable • Escalates requests for additional resources or support to CMT • Identifies any additional alternate space needs • Executes through the recovery process until effective recovery of critical functions
Resumption	BC Leader & Team once the recovery of all critical functions is complete: • Monitors the resumption process. • Reconciles recovery stage steps against current work in progress • Safe return to "business as usual" • Return personnel and critical functions to primary site or to an interim facility to restore full operations • Coordinates re-entry/re-occupancy decisions with the CMT • Participate in after action and corrective action
Planning	During the planning phase, the BCT Leader and members are responsible for: • Participating in training, tests, and exercises • Updating contact information • Participating in Business Impact Analysis (BIA) if applicable

5. Stage 1: Response

The Response phase starts with alert of the incident, through activation, initial actions, employee accountability, and initial communication with key stakeholders. The BCT will:

- Determine the magnitude and estimated length of the disruption
- Assess and prioritize specific issues
- Understand the impact to personnel and key third parties
- Identify a recovery strategy to address these issues from both a short-term and long-term perspective, as necessary
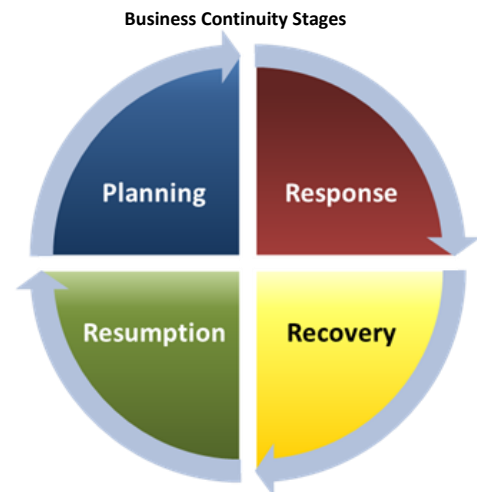
5.1. Authority and Criteria for Activation (Triggers)

The *office's top executive or delegee* can activate BCPs using a subjective assessment of the situation. Any manager may escalate to the Business Continuity Team leader for activation decision.

Potential triggers may include, for example:

- A prolonged outage impacting Team's Critical Functions or key contractual commitments
- Major impacts on receiving, ordering, delivering inventory
- Serious injury or death at our facility
- Impact to multiple warehouses
- Structural collapse or failure in a building
- Potential impact to Staples' public image/in the news

Business Continuity Stages

Planning | Response | Resumption | Recovery

5.2. Alternate Location and Telework (Work Remotely)

If the primary location for this business unit has been impacted or is unusable, the BCT may need to operate from an alternate location, or by telework/work from home. *For more information on alternate location, please refer to Appendix 7.*

5.3. Procedures for Activation

This phase can often be chaotic and good information can be hard to find. Keep calm, work systematically, and be prepared to revisit early decisions when new information is available. *Please refer to Appendix 1 for detailed checklists for this phase.*

5.4. Crisis Communications

Global Communications' **Crisis Communications Plan** is the corporate guideline for crisis communication responsibilities and procedures. That plan states that *ONLY designated members of the Crisis Communication Team or a spokesperson specially designated by Public Relations are authorized to communicate externally. No information will be released without verification and approval by Legal.*

4.4.1 Employee Accountability

A subset of crisis communications, employee accountability is one of the most urgent items for leadership. During an incident, life and safety issues are of the highest priority, so it is critical to start an employee accountability process, and continue until all impacted associates have been contacted or accounted for. Additionally, the BCT and CMT should have visibility into how we are supporting our seriously impacted, wounded, or deceased associates and/or their families. Because this is a top priority, employee accountability should be reported in each Situation Report (SitRep) released. *Please refer to Appendix 3 for Contacts. Please refer to Appendix 11 for the SitRep template.*

5.5. Documentation

Continue to keep track of key actions taken through a regular Situational Report (SitRep) and log. Fill out Risk Management forms for damaged facilities, and keep track of key actions taken through a regular Situational Report (SitRep) and log. *Please refer to Appendix 10 for Risk Management form, and to Appendix 11 for SitRep template. Please refer to Appendix 11 for SitRep template.*

6. Stage 2: Recovery

The Recovery phase is focused on continuing and recovering Critical Functions, and conducting damage assessment if applicable. This is the heart of business continuity operations. During this stage, the BCT will:

- Activate the strategy for facilities, technology, vendor, dependent process and/or personnel impact, as applicable
- Communicate temporary work location assignments to all personnel, as applicable
- Escalate requests for additional resources or support to CMT
- Identify any additional alternate space needs
- Execute through the recovery process until effective recovery of critical functions

Regardless of the event, disasters can be grouped into one or more of the following loss scenarios. The BCP Team has developed recovery strategies to address each of the following loss scenarios. The list below provides some of the strategies that may be adopted. *Please refer to Appendix 2 for more details on recovery strategies per critical function.*

Business Continuity Stages
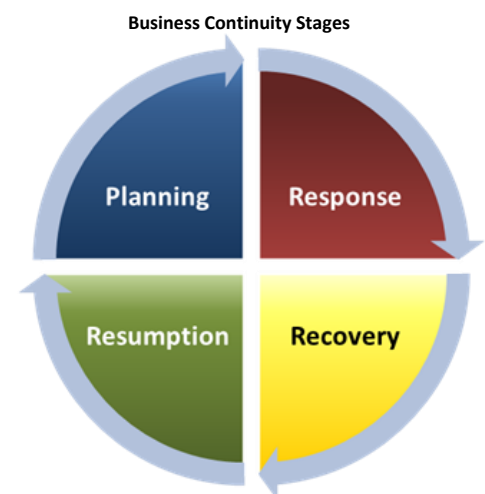
7. Stage 3: Resumption

This phase focuses on getting Staples back to normal. Resumption includes reconstituting headquarters if applicable, standing down the business continuity operations, and after action. The BCT will:

- Once the recovery of all critical functions is complete, the BCT will monitor the resumption process. This process focuses on:
  - o Steps that each business unit must take so that work performed during the recovery mode is reconciled with current work in progress
  - o Safe return to "business as usual"
- Return personnel and critical functions to primary site or to an interim facility to restore full operations
- Coordinate re-entry/re-occupancy decisions with the CMT

7.1. Stand Down & Deactivation

Stand down will begin when the CMT determines that the emergency situation has ended and is unlikely to reoccur, and the Business Continuity Team has been notified of the stand down. Deactivation involves the steps required to transition from business continuity activation back to normal operations.

7.2. After Action/Hotwash and Corrective Action

Immediately following a business continuity activation, while the incident is still fresh in participants' minds, Staples business continuity planners will facilitate an After Action "Hotwash"[1] to review lessons learned: what went well, and what changes are required in the plans and procedures. Hotwash items will be collected and key findings will be collected into a Corrective Action Plan (CAP), with specific responsibility and timeframes assigned.

CMT members will:

- Following the incident "Stand Down", CMT members will attend an after-action session, called a "Hotwash", to share lessons learned and to identify corrective action.
- Attend business continuity training
- Participate in business continuity tests and exercises

Please refer to Appendix 1 for detailed checklists for this phase.

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[1] Hotwash is a military term adopted by emergency managers, though the original military use of the word is unclear. A hotwash is also referred to as a post mortem. A "cold wash" refers to an incident review done much later, when the lessons learned are not as immediate.

8. Stage 4: Planning, Training, Exercising

Planning refers to the programmatic elements of the Business Continuity Management System, including conducting a Business Impact Analysis (BIA) and risk assessments, updating the plan with lessons learned and correction action, conducting training on business continuity, testing business critical systems, and conducting exercises to reinforce and expand upon training.

Business Continuity Stages

Planning | Response | Resumption | Recovery

The designated business continuity planner(s) will:
- Update the BCP and supporting documentation to incorporate lessons learned and corrective action
- Regularly conduct Business Impact Analysis (BIA) to ensure the Business Continuity Plan is in alignment with business unit needs and configuration
- Regularly conduct risk assessment to identify risk and treatments
- Plan and conduct tests and exercises

Please refer to Appendix 9 for additional information on Staples' Training, Test, and Exercise approach.
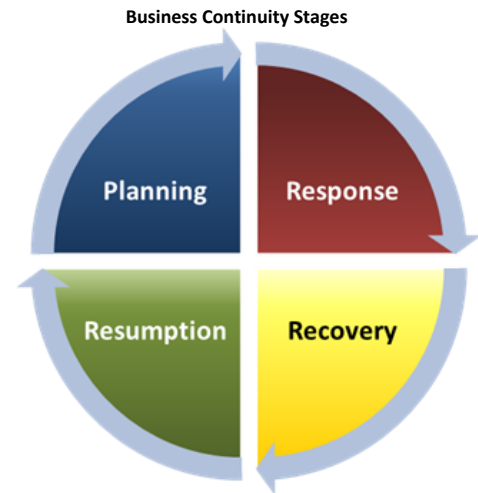
APPENDICES

APPENDIX 1: CHECKLISTS AND PROCEDURES

This section contains checklists and procedures by phase. The top line of each checklist is color-coded by stage, and begins with the stage name.

Appendix 1.1: Activation Checklist

	Response – Activation Checklist
	Note: this is the same checklist as on page iii
#	**Action/Discussion Item**
1	**Ensure Life and safety**. Identify and account for urgent life/safety issues and secure damaged facility for safety.
2	**Assess scenario and impact.** Get up to speed with the person(s) reporting it: • Summary of situation • Initial response actions, if any • Impact on people, facilities, Critical Functions
3	**Escalate to Crisis Management Team.** Determine if the incident is serious enough to require business continuity activation. If serious, it must be escalated to Staples executives.
4	**Set up initial meeting conference line.**
5	**Coordinate Initial Meeting.** Contact and coordinate with other interdependent Critical Functions, as needed per your business unit's recovery strategies. Some potential partners may be the below, for example: • Managers - corporate • Supply Chain • IT • Public Relations • HR • Facilities • Security • Customer service • Transportation • 3rd party liaison • Incident specific partners
6	**Identify Impacts.** Personnel, Critical Functions, facilities, technology, vendors.
7	**Priorities**. Establish priorities on what to do first, update team as they change.
8	**Responsibilities**. Who's doing what? Outline roles and responsibilities, how often to provide updates.
9	Recovery. • Identify recovery strategies (Appendix 2) by priority of critical function. • Identify lead for each recovery strategy.
10	**Work with Crisis Communications.** Staples Global Communications will lead all internal and external communications, in accordance with Crisis Communications Plan.

Appendix 1.2: Recovery Checklist

#	Action/Discussion Item	Notes
	Recovery – Operations Checklist	
	Employee Accountability	
1	Address any known fatalities or casualties. • Work with Human Resources to contact associates and to address with sensitivity any fatalities or injuries of staff, family members, etc. • Control the flow of information until family members have been notified. • Provide a consistent point of contact for impacted employees/families, and prioritize taking care of them and keeping them informed. This is important primarily as a matter of human decency and accountability, but also as a way of protecting brand image.	
2	**Ensure safety and security** is maintained at both the impacted primary site and the alternate facility. A liaison member may be needed at the impacted facility in order to interface with law enforcement and responders.	
3	**Enact recovery strategies, by prioritized critical function.** Identify and enact recovery strategies that are best for this incident, starting with highest priority critical functions. Refer to Appendix 2 for recovery strategies list.	
4	**If relocated, notify vital internal and external stakeholders.** Working with Global Communications, let partners know new contact information, alternate location, operational status, and anticipated duration of relocation (if known).	
5	Complete and Update SitReps. • Complete (or delegate completion) a Situation Report (SitRep) to capture the situation and actions taken. (Appendix 11 for SitRep) • Establish schedule for updated SitReps and inform stakeholders. Initially, choose from hourly, every 6 hours, every 12 hours (minimum). As incident cools, can publish SitRep daily. • Update and publish SitReps based on schedule.	
6	Complete and Update Employee Accountability Report. • Establish a time for the initial accountability report on the status of associates. • Coordinate with supervisors to establish reporting requirements and timing for accountability reports. • Continue accountability (impacted, sick, injured) until all personnel have been accounted for or reached. • Combine employee accountability into SitReps.	
7	**Provide status updates** to senior/executive management and other partners as required.	
8	**Establish a work schedule for employees.** Consider VPN restrictions (if any) and accommodate with shift rotations.	
9	**Inform all involved about resources they can use.** Staples responders, associates and their families, and those directly impacted by the incident have support they can tap into, including Employee Assistance Program (EAP), Red Cross and local resources, Staples Share Fund, etc.	
10	**Consider procurement** for any supplies, or equipment that may be needed for the incident. Identify any limits or approvals required.	

#	Recovery – Operations Checklist	
#	**Action/Discussion Item**	**Notes**
11	**Coordinate with supervisors on telework/remote work** to ensure that critical functions are being accomplished effectively, and to revise assignments in order to respond to changes in specific work needs.	
12	**Conduct routine briefings** to verify status of operations and obtain information concerning emerging needs.	

Appendix 1.3: Recovery - Damage Assessment Checklist

The person who has been identified by the BCT to conduct the Damage Assessment will secure the scene to prevent unauthorized access, and once the incident is stable will *complete the Risk Management damage form (Appendix 10)*, then conduct damage assessment.

Required safety precautions for Damage Assessment include:
- Be careful! Watch for hazards. Wear proper Personal Protective Equipment, including hard hat and respirator (if water damage)
- Turn off electricity and natural gas
- Assess the exterior for stability before entering the facility
- Avoid sparks or open flames. Use non-sparking light sources (flashlights, floodlights) and do not smoke in the area. Do not touch exposed wires or lights.
- Be careful of tripping or slipping

When completing damage assessment, use the below checklist.

#	Areas of Assessment	Damage		Severity			Notes
*How to Assess Damage if A Staples Facility Has Been Seriously Damaged*							
#	**Assess Structural Damage**	**Yes**	**No**	**High**	**Med**	**Low**	**Notes**
1	Roof - damage, displacement, or removal						
2	Foundation - gouges, cracks, splits, water damage						
3	Exterior - damage to vents, chimneys, air ducts						
4	Exterior walls - damaged or unstable						
5	Interior walls damaged or unstable?						
6	Windows						
7	Floor						
8	Debris						
9	Flooding or water damage						
10	Sewage or plumbing damage						
11	Are above-ground platforms, ladders, and grating safe for use? (if applicable)						
12	Furniture and furnishings						
13	Inventory						

#	Areas of Assessment	Damage		Severity			Notes
	How to Assess Damage if A Staples Facility Has Been Seriously Damaged						
14	Other						
	Assess Technology Damage	**Yes**	**No**	**High**	**Med**	**Low**	**Notes**
15	Power/electric systems						
16	Conveyor belts (if applicable)						
17	HVAC systems						
18	Computer systems, including UPS						
19	Printers						
20	Copiers						
21	Other						
	Additional Damage	**Yes**	**No**	**High**	**Med**	**Low**	**Notes**
22							
23							
24							
25							
26							
27							
28							

Appendix 1.4: Resumption - Reconstituting Headquarters Checklist

#	Resumption – Reconstituting Headquarters Checklist	Notes
	If Staples Headquarters Has Been Significantly Damaged, or Destroyed	
#	**Action Item**	**Notes**
1	**Coordinate repair/acquisition of damaged/new facility(ies)**; coordinate repair or build-out of facility(ies); procure equipment and supplies for operation, coordinate transportation and other services as required.	
2	**Provide status updates** regarding the damage assessment, restoration effort, or if necessary new facility leasing efforts, and the anticipated return date.	
3	**Supervise the repair or acquisition** process and notify the CMT of the status of repairs, including time estimates of when the repairs will be completed.	
4	**Conduct appropriate security, safety, and health assessments** to determine the building's suitability (if the primary facility was restored).	
5	**Install, test, and coordinate all systems, communications, and other required capabilities**. Ensure operational capability to accomplish all critical functions/operations at the new or restored facility.	
6	**Develop plans and schedules for the orderly transition** of all Staples critical functions, personnel, equipment, and vital records from the alternate site to the reconstituted Staples Home Office.	
7	In coordination with the CMT, **determine schedule for re-entry** of Staples personnel to primary or new facility, including staggered return and alternate work schedules as required.	
8	**Supervise the overall return** of personnel, equipment, and documents to the primary facility.	
9	In conjunction with CMT, **coordinate re-staffing if required**; coordinate alternate work methods and schedules with personnel; ensure personnel accountability in respect to return/relocation to reconstituted facility.	
10	Report status of the relocation to the stakeholders as necessary or as directed by the CMT.	
11	**Participate in an after-action review** of continuity operations and effectiveness of plans and procedures, identify areas for correction, and develop a remedial action plan as soon as possible after the reconstitution.	

Appendix 1.5: Resumption - Stand Down and After Action Checklist

#	Action Item	Notes
	Resumption - Stand Down and After Action Checklist	
1	**Assess the Situation.** The CMT will assess the situation to determine if the incident has passed and critical functions have returned to stable operations.	
2	**Declare stand-down.** The CMT will declare a stand-down or ceasing of continuity operations.	
3	**Wrap up continuity operations.** The BCT will wrap up special operations, begin transitioning back to normal operations.	
	Document! While it's fresh, make sure that all of the relevant items have been documented. Who participated, what was accomplished, explanation of key decisions, accounting for items purchased, updating of Situation Report (SitRep).	
4	**Hotwash.** A senior emergency planner will facilitate a "hotwash" or "post mortem" review. All who participated in the activation will gather, for a facilitated discussion of the continuity activation and existing documentation/processes. Each person will identify "3 Up, 3 Down" – three positives and three areas for improvement. A scribe will capture discussion.	
5	**Return to normal operations.** All activated personnel will resume normal pre-incident activities.	
6	**After Action Report.** This report will contain a summary of the incident, actions taken, and feedback from the Hotwash.	
7	**Corrective Action Plan.** The key areas for improvement from the Hotwash will be consolidated into a table, responsibilities and deadlines assigned, and emergency planners will follow up on correction action items.	
8	**Update BCP and processes.** Based on lessons learned from the Hotwash, the emergency planner(s) of the identified business unit(s) will update the Business Continuity Plan(s).	

APPENDIX 2: CRITICAL FUNCTIONS AND RECOVERY STRATEGIES

Appendix 2.1: Critical Functions

This appendix lists and outlines the critical functions for [Office].

Appendix 2.1.1: Critical Functions by Recovery Time (Maximum Allowable Outage)

	MAO Within 4 Hours	MAO 4-8 Hours	MAO 8-24 Hours	MAO 24-72 Hours	72+Hours
Office Sub-units					

Appendix 2.1.2: Critical Functions Summary, Outage and Priority

Max outage (Recovery Time Objective) is broken out by seasonal criticality where relevant; the associated priority are associated with the most urgent season. Priority aligns with the new 2016 Disaster Recovery (DR) tiers for IT applications, and are based on the following max outages/Recovery Time Objectives (RTOs).

Business Unit	Critical Function	Function Summary	Maximum Allowable Outage	Priority (at most urgent)

Appendix 2.2: Impact of Outages

When applications are not available, this can have widespread impacts, to include current and future financial losses, damage to reputation, regulatory noncompliance.

Impact of outages can include:

Impact	Office	Details
Life/Safety		
Financial		
Operations		
Legal / Regulatory		
Reputation / Brand		

Appendix 2.3: Workarounds / Recovery Strategies for Critical Functions

Below are sample recovery strategies for critical functions. Specific strategies for Team are outlined in the next section.

Appendix 2.3.1: Workarounds / Recovery Strategies - General

BCP Area	Strategy
Loss of Facility	●
Loss of Technology	●
Loss of Work Force	●
Loss of Critical Vendors	●

Appendix 2.3.2: Workarounds for Critical Function (Recovery Strategies)

Business Unit	Workarounds	How to Do Workarounds - Details	Coordination with Staples IT

APPENDIX 3: CONTACT INFORMATION

Appendix 3.1: Business Continuity Team Contact List

Business Continuity Team				
Title	**Name** (Alphabetical)	**Office Phone**	**Cell Phone**	**Email**
Senior Management (Alphabetical)				
Corporate Team Members (Alphabetical)				

Appendix 3.2: Warehouse Managers Contact List

FC Managers and DC Directors (Alphabetical by Warehouse)				
Title	Name	Office Phone	Cell Phone	Email

Appendix 3.3: Internal Dependencies' Contact Information

Corporate Hotlines				
Security: Redacted				
Facilities: Redacted				
IT Rapid Response & Recovery : Redacted				
Public Relations: Redacted				
Supply Chain Command Center: Redacted				
Risk Management: Redacted				
Human Resources Redacted				
Customer Service Through SC Command Center or IT RRR				
Corporate Key Contacts - Non Hotline				
Title	Name	Work	Cell	Email

Appendix 3.4: External Dependencies' Contact Information

Appendix 5 lists external dependencies by area. This appendix provides contact information for critical vendors, in case the normal electronic databases are not available during a business interruption.

Because of the large number of vendors, this contact list is embedded. Click on the icon below for contact information for the critical external dependencies/vendors.

[Redacted]

See Appendix 5 for a listing of external dependencies.

APPENDIX 4: CRITICAL TECHNOLOGY (DISASTER RECOVERY)

This appendix identifies the technology that supports critical functions. Critical technology and timeframes for recovery and data loss were identified through the Business Impact Analysis (BIA) process. Key terms are outlined below.

- **Recovery Time Objectives (RTO).** RTO refers to the maximum time an IT application can be unavailable, or the time by which an app must be recovered before there is severe impact on the business unit. RTO is linked to criticality of the impacted critical function. The below table outlines RTOs by application.

- **Recovery Point Objectives (RPO).** RPO refers to the maximum amount of data that can be recreated manually, by IT application. For example, the data that was entered throughout the day was lost because of the incident. RPO reflects if business units can recreate an hour's worth of data, or 24 hours, or must the data be continuous with no data loss. The below table outlines RPOs by application.

Appendix 4.1: IT Applications List, and Disaster Recovery Metrics

Applications	Group	RTO (Within Hrs)	DR Tier	RPO (Hrs Data Lost)

APPENDIX 5: DEPENDENCIES

Appendix 5.1: Internal and External Dependencies List

Business Unit	Critical Function	Dependence Level	Internal Dependencies	External Dependencies

Appendix 5.2: Levels of Dependence on Workspace, Workforce, Vendors

Appendix 5.2.1: Level of Dependence on Primary Workspace

Group	Critical Function	Workspace Dependence Level	Workforce Dependence Description

Appendix 5.2.2: Level of Dependence on Workforce

Group	Critical Function	Workforce Dependence Level	Workforce Dependence Description

Appendix 5.2.3: Level of Dependence on Vendors

Business Service Area	Critical Function	Vendor Dependence

Appendix 5.3: Critical Records

The following section identifies the critical records which may be needed at time of disaster. A vital record is defined as an electronic or paper record which is considered to be essential to the continuation of business following an incident. Also indicated are storage locations (on and off site), as well as backups, if any. Examples of vital records include employee data, payroll, financial and insurance records, customer data, procedures, records, legal documents, contracts, agreements, intellectual property, etc.

Business Unit	Vital Records Description

APPENDIX 6: BIA AND RISK ASSESSMENT

Appendix 6.1: Risk Assessment
The most current risk assessment can be found at Redacted.

Appendix 6.2: Business Impact Analysis (BIA)
The most current BIA can be found at Redacted

APPENDIX 7: TELEWORK AND ALTERNATE FACILITIES

Appendix 7.1: Telework (Working Remotely)

Telework, or working remotely, is a powerful business continuity strategy for some functions that have low dependence on a specific workspace. The ability to telework depends on proper function of the broader communications infrastructure and Staples' VPN, data, and IT infrastructures. Critical personnel are expected to have or obtain laptops rather than desktops, and to carry the laptops home with them every night. Telework can be done at home or at any location with secured Internet (not open Internet connections that can be monitored).

Appendix 7.2: Alternate Facilities

Staples has a robust network of Fulfilment Centers (FCs) and Distribution Centers (DCs) across the US and Canada, with Order Fulfilment Logic to reroute orders to other warehouses based on product line, volume, and proximity.

APPENDIX 8: HUMAN RESOURCES

Appendix 8.1: Employee Assistance Program (EAP)

It is normal to be affected by an upsetting situation – even professional first responders get counseling after difficult calls. Help is available to you.

Following any stressful incident, managers should make sure that all full-time or part-time associates know that free, confidential EAP counseling and referral services are available to them <u>and</u> their immediate families.

After an upsetting incident or threat, people often have strong feelings that can disrupt their lives, such as difficulty with processing negative experiences, anxiety or fear of a similar situation happening again, grief, or other difficult thoughts. Facility managers should provide information on the assistance Staples provides through [redacted] Employee Assistance Program (EAP).

EAP assistance is available to all full-time associates, all part-time associates, and their immediate family members.

Associates and their families can reach this <u>free</u>, completely <u>confidential</u> assistance by: Redacted

E4health EAP provides confidential counseling and referral services to help you get through life's unexpected complications and manage day-to-day tasks better. EAP provides personal assistance for your health, finance and life balance.

Depending on your issue, the EAP may refer you to a counselor who is not part of the EAP. This treatment may be covered by your medical plan. The EAP can help you understand your options, if a referral is required.

APPENDIX 9: TRAINING, TESTS, AND EXERCISE PROGRAM

Staples adopts a "stair step" approach to teaching continuity staff critical skills needed for an incident. Each phase builds upon previous learning, so critical personnel can feel confident in what they have learned.
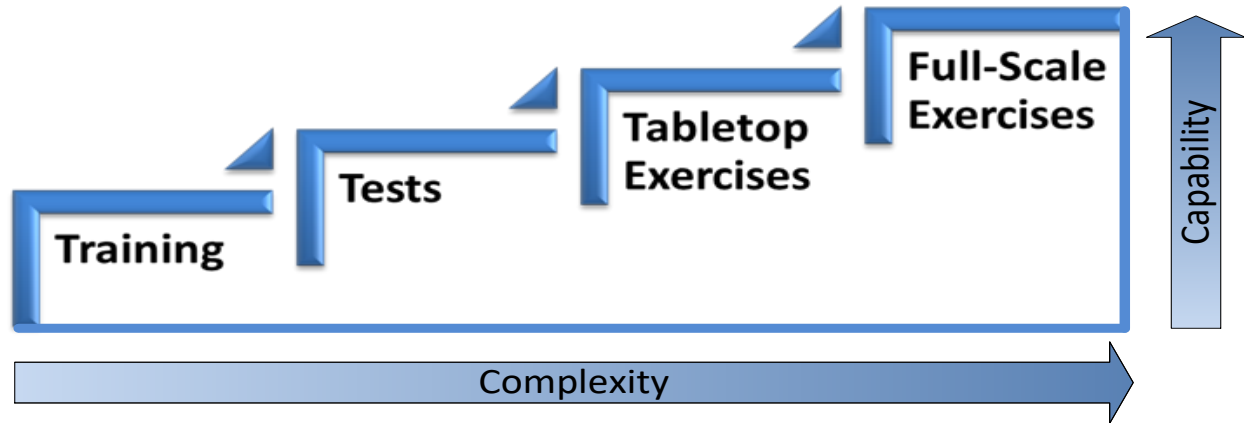
Appendix 9.1: Training

Training teaches critical skills and knowledge to critical personnel, and helps general employees know the basics about our business continuity plan.   Training may include:

- Implementation Training: teaches critical personnel the key details of the Business Continuity Plan and what to do following BCP activation.

Appendix 9.2: Tests

Tests verify the function and recovery of equipment, systems, and data. Tests may include:

- Test Disaster Recovery plans for recovering essential information systems, services, and data.
- Test alert, notification, and activation of critical personnel.
- Test simultaneous telework capability.

Appendix 9.3: Exercises

Exercises allow critical personnel to practice processes and skills in advance of an incident. Examples of exercises include:

- Tabletop Exercise: an informal gathering of critical personnel around a table to simulate an emergency situation and discuss general problems and procedures in the context of an emergency scenario. The focus is on training and familiarization with roles, procedures, or responsibilities.
- Full-Scale Exercise: a longer exercise that involves Business Continuity Team members acting out a scenario, such as relocating to another facility, and functioning from that site as if an emergency has occurred.

APPENDIX 10: DAMAGE ASSESSMENT

Appendix 10.1: Insurance and Property Damage/Loss

Submit to Risk Management a completed Property Loss report within 24 hours of damage.

Redacted

Please follow the checklist in Appendix 1 for damage assessment

APPENDIX 11: SITUATIONAL REPORT (SITREP)

Below is a template for the Situational Report (SitRep) for a business continuity incident. This provides documentation of what has happened to all involved partners, and serves as a record for later insurance claims.

Situation Assessment Report Form	
Business Unit:	
Prepared by:	
Name/Type of incident:	
Date of Incident:	Time of incident:
Location Impacted:	
Description of Incident:	
Have people been contacted? If yes, what time:	☐Yes ☐No
Total people at affected location: How many are accounted for? Unaccounted for?	
Was anyone injured? If yes, how many are injured? are the fatalities?	☐Yes ☐No
Are there any threats to the health/safety of employees at the affected location? If yes, explain:	☐Yes ☐No
Other people concerns/issues:	
What is the status of data availability/key applications/telecoms?	
What is the overall current status of work-in-processes?	
Have any Staples LP's or GP's been affected?	☐Yes ☐No
Has any communication gone out to LP's and GP's?	☐Yes ☐No
Are there any reputational, media, or public issues?	☐Yes ☐No
Are there any alternate space requirements?	☐Yes ☐No

APPENDIX 12: AFTER ACTION REPORT (AAR)

An After Action Report (AAR) should be completed following any incident that requires activation of the BCP. This report will contain a summary of the incident, actions taken, and feedback from the Hotwash/post-mortem.   The purpose of this form is to document the incident and the response, as well as to identify opportunities for improvement. This form should be completed by the BC Team Leader or designee, in conjunction with the BC Team. Upon completion, a copy of this report should be on file with the BCT Leader and a copy should be provided to the CMT electronically.

After Action Report Form		
Name/Type of incident:		
Date of Incident:	Time of incident:	
Root cause (What was this incident a result of?):		
Initial notification received by:		
Method of notification:		
Was the BC Team Leader notified in a timely manner?	☐ Yes	☐ No
Was the BCP activated in a timely manner?	☐ Yes	☐ No
What method was used for notifying/informing Supply Chain employees?		
Was anyone injured? If yes, how many are injured are the fatalities ?	☐ Yes	☐ No
Map the incident timeline:		
Which public agencies were involved in the response?		
Which actions taken/decisions made by the BC team were effective?		
What are the opportunities for improvement? (task, person responsible, timeline)		
What changes/additions are needed for the BC Plan?		

APPENDIX 13: RELATED STAPLES CRISIS PLAN

Appendix 13.1: Crisis Management Plan

The latest version of the Staples Crisis Management Plan.

Redacted

Appendix 13.2: Crisis Communications Plan

The latest version of the Staples Master Crisis Communications Plan is owned by Global Communications, and updated by the Business Continuity team.

Redacted

END OF DOCUMENT

Emergency Response Plan (ERP)

Supply Chain FC/DC
2019

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Emergency Response Plan
Staples Inc. Supply Chain FC/DC 2019

Contents

1. Overview

DON'T LET AN INCIDENT SHUT YOU DOWN!

A facility manager does not ask if an incident is possible, but asks "what could happen, and when?" Staples supply chain facilities deal with problems all the time, as a regular part of business. Whether it is a natural disaster (such as severe storms, floods, or earthquakes), or the far more common man-made emergencies (such as fire/smoke, pipe burst, chemical or oil spills, or violent person), some facility problems are big enough that they need additional planning and response. This plan is for handling incident and emergencies at Staples FCs/DCs.. This plan will help deal with:

- Risk to the health and safety of associates
- Customer impact
- Interruption to operations
- Damage to equipment and inventory
- Damage to Staples' reputation
- Financial impact

1.1. Approach

We have a phased approach to emergency response. Please fill out the pre-planning items in Phase 1 and appendices, and be familiar with Phases 2-4.

Members of the facility Emergency Response Team (ERT) should keep a copy of this plan where it will be available during business hours and off-hours as well. Since it is Sensitive and has Private data in it (such as associates' home and cell numbers), this plan is an internal document that should be safeguarded– kept inside access-controlled areas, limited distribution, and not shared outside the company.

1.2. Scope

This Emergency Response Plan (ERP) provides advance planning and crisis response, **specific to this facility only**, for all hazards. It has general emergency planning for most incidents, and specific planning for incidents that need a specific response. *This plan is written for facility managers and emergency response team, and applies to associates and on-site contractors.* This plan was written in coordination with the Facilities Emergency Plan (how Corporate handles facility-based emergencies).

1.3. Home Office Incident Management

This plan covers local emergency management, confined to this facility. Any incident that goes beyond this Emergency Response Team's management scope (generally when local resources are overwhelmed, or in a wider-spread incident, and/or any incident with death or substantial injury) becomes the responsibility of the Home Office Supply Chain Incident Management Team, and/or the Staples-wide Crisis Management Team. Contact information for escalating upwards to Supply Chain incident management can be found in *Appendix 1.*

2. Phase 1: Pre-Planning

This section outlines the pre-planning to be done <u>before</u> an incident or emergency. **Please refer to Section 3 for how to handle an incident after it has happened.**

2.1. Who Does What

2.1.1. Identify Pre-Planning Roles and Responsibilities

The assignment of specific emergency responsibilities is another important element of emergency planning. This plan identifies the roles of staff during and after-business hours – these individuals may or may not be members of the Emergency Response Team (ERT).

It is recommended that key positions be posted around the facility, particularly those with specialized skillsets required in an incident, such as phone cord tags. The Emergency Coordinator must complete the below table to identify who is responsible for which element of planning. If there are multiple people responsible for a role, use bullets.

Table 1: People Responsible for Pre-Planning Areas

| Area of Responsibility |
| --- |
| Emergency Coordinator (annual plan update, emergency team training, evacuation & shelter drill) |
| Facility evacuation marshals (assist building evac coordinator to ensure complete evacuation, including for those with disabilities) |
| Maintenance lead (if applicable) |
| Medical teams: CPR or first aid certified |
| Critical computer equipment/data |
| People with other relevant skills (list names and their skills) |

2.1.2. Emergency Response Team (ERT) Members

The Emergency Response Team (ERT) is an incident response team, made up of managers and those with specific knowledge that will likely be needed in an incident. Members of the ERT will have pre-defined roles so that in an incident, they can immediately begin addressing their responsibilities. Details that may be needed during an incident (key locations, contact information, checklists) can be found in the appendices at the end. Below are the positions and roles on the ERT, and the individuals pre-identified for these roles. Please refer to *Appendix 1* for contact information.

Table 2: ERT Structure
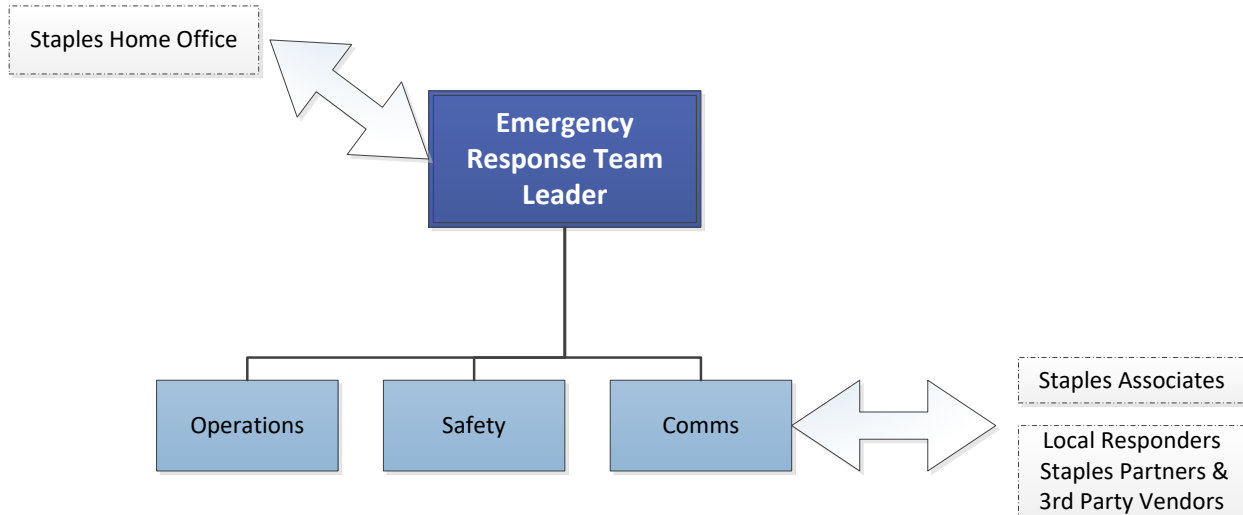
The Emergency Coordinator must complete the below table to identify who is on the ERT.

Table 3: ERT Positions, Roles, and Individuals

Position on the ERT	Role
ERT Leader	• Leads incident management efforts onsite • Oversees other positions on ERT • Coordinates upwards with Home Office • Must have the authority to close building and activate this plan
Operations Chief	• Reports to ERT Leader • Focuses efforts on operations
Safety Lead	• Reports to ERT Leader • Focuses efforts on life and safety initiatives
Communications Lead	• Reports to ERT Leader • Focuses efforts on notification and liaison • Oversee coordination with Staples associates • Coordinate with partners and third party vendors

2.3. Building/Campus Pre-Planning

2.3.1. Command Posts

Management will gather and handle the incident in Command Posts either inside the facility, or in one of several locations nearby. The Emergency Coordinator must identify command posts in ***Appendix 2.***

2.3.2. Shelter-in-Place Pre-Planning

This section focuses on pre-planning. For how to shelter-in-place, **see Section 3.3.2.**

One of the instructions the ERT may give employees in an emergency is to shelter-in-place. This is a precaution aimed to keep associates safe while remaining indoors. (This is not the same thing as going to a shelter in case of a storm.) You might need to shelter-in-place because of dangerous weather outside such as a tornado, or because of a violent person outside the facility, or because chemical, biological or radiological contaminants have been released accidentally or intentionally into the environment. As incident managers, you may be told to shelter-in-place by local authorities, or you may decide that there is more hazard outside than inside. Once sheltering in place, ***associates may choose to leave instead of sheltering in place, but <u>may</u> <u>not</u> <u>return</u> once they leave***, in order to keep other associates safe. All employees should practice how to shelter-in-place at least annually.

The Emergency Coordinator must complete ***Appendix 2*** to identify this facility's shelter-in-place areas. Large storage closets, utility rooms, pantries, copy and conference rooms without exterior windows will work well. Shelter-in-place areas should be on the lowest level, toward the center of the structure (as many walls as possible from the outside), have no outside windows (or as few as possible), have space for associates to gather, and have as few items that can be turned into projectiles as possible (understandably difficult in a warehouse). The room(s) should have adequate space for everyone to be able to sit down. Avoid overcrowding by selecting several rooms if necessary. Avoid selecting a room with mechanical equipment like ventilation blowers or pipes, because this equipment might not be able to be sealed from the outdoors.

The Emergency Coordinator must ensure that shelter-in-place areas are marked as such and stocked with a copy of this plan, and with supplies (water, flashlights, walkie-talkie radios, battery powered radios, first aid supplies, duct tape, plastic sheeting, plastic garbage bags). The shelter-in-place areas should have a hard-wired phone if possible, with lists of emergency contacts available.

2.3.3. Evacuation Pre-Planning

This section focuses on pre-planning for evacuation – for **how to evacuate, see Section 3.3.3.**

All people in the facility should know how to evacuate and where to gather after evacuation. The Evacuation Coordinator must:

- Post maps for evacuation and evacuation gathering points in common areas and stairwells.
- Post at every landing in every stairwell a map of the stairwells in the building and where they lead.
- Clearly mark post-evacuation exterior assembly areas with a sign.
- Work with safety lead to ensure that all associates practice evacuation at least annually.
- Identify and train volunteer evacuation marshals.
- Complete *Appendix 2*.

The Evacuation Coordinator must complete the below:

Table 4: Evacuation Planning for Visitors or Contractors

Evacuation Planning	Details
How this facility will account for visitors or contractors after an evacuation	[Describe]

Some people (associates who work in the facility regularly, or visitors or contractors) may have special needs that could impact their ability to evacuate, including hearing or visual impairment, or reduced mobility (wheelchair, crutches, limited mobility). Know the specific disabilities with which you are dealing. Planning for the safe evacuation of someone in a wheelchair will be different than planning for a deaf tenant who will not hear the fire alarm. The Evacuation Coordination should pre-identify and train volunteer evacuation marshals who are trained on the special accommodations that are required for persons with disabilities. This may mean assigning a special Evacuation Monitor to an individual and making sure they get out safely.

Table 5: Evacuation Planning for Those with Disabilities

Evacuation Disabilities Planning
What specific kinds of disabilities need to be planned for at this time? (update annually)
Accommodations for disabilities at this facility

2.3.4. Building Systems

Information on the pertinent building systems should be stored in a secure place. Complete the below table on building systems, for reference:

Table 6: Planning for Building Systems

Building Systems Planning	Details
Sprinkler system: 1. Where are the sprinkler heads? 2. How are they activated? 3. Is it a water or halon system, and where? 4. Who services it and how often? 5. Where are the shut-offs? 6. Are the sprinkler shut-offs clearly labeled, with waterproof instructions on how to turn on/turn off? (If not, please do) 7. Is the sprinkler system tested and purged quarterly? Do you keep records of the tests?	**Sprinkler system:** 1. 2. 3. 4. 5. 6. 7.
Utility shut offs: 1. Where do the gas, electric, and water enter the building? 2. How are gas, electric, and water entry points and control valves marked? (If not marked, please do) 3. How and where is gas shut off? 4. Are gas and power shut-offs clearly labeled, with waterproof instructions on how to turn on/turn off? (If not, please do) 5. How and where is electric/power shut off? 6. How and where is water shut off? 7. Who has been trained on how to shut these valves or disconnect the supplies? 8. Are the electric panels clearly labeled? (if not, please do)	**Utility shut offs**: 1. [Complete] 2. 3. 4. 5. 6. 7. 8.
Emergency lighting/generator: 1. Generator: what fuel and size? 2. Generator: where is it? 3. Generator: what does it power, and for how long? 4. How often is the generator tested, and by whom?	1. 2. 3. 4.

Building Systems Planning	Details
Security system/access control: 1. What access control measures are in place? 2. Is your security set to "Fail Secure" (locked doors) instead of "Fail Safe" (unlocked)? (Note: only set to Fail Secure if doors have emergency push bars to allow trapped employees to escape) 3. Is the security system tied directly to the police and fire departments or is there an independent monitoring service? 4. What activates the security system? 5. What security measures are there to prevent workplace violence?	**Security system:** 1. [Complete] 2. 3. 4. 5.
Smoke evacuation system: 1. Location of fans/louvers and controls or switches to turn them off 2. Are they isolated individually or wired in series? (1 switch per fan vs 1 switch for many)	**Smoke evacuation system:** 1. [Complete] 2.
Air system: 1. Do you have HVAC system or louvers/fans for outside air? 2. If HVAC, where are the HVAC intakes located and how can they be shut off? 3. If outside air, what is the setup, and how can it be sealed off? 4. Identify any HVAC intakes' vulnerability to tampering (see http://www.cdc.gov/niosh/docs/2002-139/pdfs/2002-139.pdf)	**HVAC system:** 1. [Complete] 2. 3. 4.

2.3.5. Blueprints

Blueprints are essential for the fire department in locating mechanical equipment, elevators, stairwells, roof accesses, etc. They should be stored in a safe location that is easily accessed. The Emergency Coordinator should make sure that:

- There are multiple copies of the blueprints.
- The blueprints have marked on them:
  - Stairwells for evacuation
  - External doors for evacuation
  - Shelter in Place areas
  - Evacuation gathering point outside the facility
  - Stand pipe (fire fighting water supply)
  - Roof access points
  - Shut-offs to water and utilities
  - Emergency generator
  - Any storage place for fuel or explosives
- Update **Appendix 2** with blueprints that show as much of the above as possible.
- A copy should be moved to the guard shack or to a Knox Box, for the fire department.

Since time is of the essence in an emergency, it is important to provide a specific location. On any given day the person who knows where it is located may be away and a new person will be left searching through many spots. Complete the below table with information on where blueprints are located.

Table 7: Location of Blueprints

Blueprint Location – General	Blueprint Location - Specific
This Plan	Appendix 2

2.3.6. Keys or Access Cards

Several sets of keys or access cards should be set aside for emergency use. When the fire chief, security staff, etc. arrive at the site, they need immediate access to the building and to all spaces within. Included should be master keys or keycards for the entire building.

Table 8: Location of Emergency Keys or Access Cards

Keys/Access Cards Location – General	Keys/Access Cards Location - Specific
Guard Shack	
Security Desk	

2.3.7. Relocation Pre-Planning

Existing operations and inventory may need to be relocated to a new place, in coordination with corporate Facilities. Corporate Real Estate can help find new space.

2.4. Pre-Coordination with Key Partners

This section focuses on pre-planning on how to coordinate with key partners. **For how to coordinate during an incident, see section 3.1.**

It is a common saying in emergency management that the scene of an incident is not the place to swap business cards. Incidents can be managed much more smoothly when facility managers know and have worked with key partners – Corporate, law enforcement, first responders, etc. - in advance.

The ERT must coordinate with local first responders (law enforcement, fire, emergency medical) in advance of an incident; best practice is to do this annually. This coordination may be combined with evacuation/shelter-in-place drills, or may be conducted separately. The purpose is to:

- Most importantly, create and strengthen relationships with local first responders before an incident.
- Create and practice procedures on how they will access the facility – including providing first responders with blueprints and emergency access capability.
- Identify and mitigate any concerns before an incident.
- Check that their standard equipment, apparatus, and procedures will work in our operating environment.
- Any new Standard Operating Procedures (SOPs) that are formed as a result of these exercises should be included in an appendix of this plan.

The Emergency Coordinator must complete **Appendix 1**'s contact lists for key partners, inside Staples and outside.

2.5. Training and Exercises

Without training and exercise, any emergency response plan by itself is little more than a paperweight. Training and exercises together form a solid approach to instructing managers and associates on how to use this plan.

Training allows managers and associates the opportunity to learn how to use this plan before the stress of an actual incident. Exercises solidify the knowledge gained from reading the plan and from training, and allow incident managers to identify gaps in planning or areas for refinement. Further, exercises with local first responders (law enforcement, fire, etc) create and strengthen bonds so that in an emergency there is minimal time wasted on introductions and determining how to work together.

Following an exercise, the Emergency Coordinator will identify required corrective action and make a plan for fixing it, and will update this plan if gaps or issues are found.

2.5.1. Emergency Response Personnel

- **Training**: All members of the ERT must be trained on emergency response (including this plan, ERT structure and roles, evacuation, shelter-in-place, and notification) annually.
- **Exercise**: All ERT members must exercise emergency response (to include notification, shelter-in-place, evacuation, and operating from the command posts) annually.
- **Plan**: this plan must be reviewed and updated annually.

2.5.2. General Associates

- **Training**: All associates must be trained on emergency response (including evacuation, shelter-in-place, and notification of an incident) annually. This training can be combined with safety/health training. Please see *Appendix 3* for a 1-pager about training associates on emergency response.
- **Training**: Evacuation Marshals and facility emergency medical teams will receive specialized training on how to do their jobs, including First Aid training, reviewing the key elements of this plan, and training on building evacuation routes and assembly points.
- **Exercise**: All associates must participate in at least one evacuation and shelter-in-place exercise per year. This includes leaving normal work stations and either moving to the shelter-in-place area(s) or evacuating and gathering at assembly areas. In both instances, the ERT will follow the evacuation and shelter-in-place checklists in this plan.

3. Phase 2: Notification and Incident Management

3.1. Notification and Initial Emergency Communications

The Emergency Response Team will learn about an incident or potential incident through a number of routes: directly, being notified by line supervisors, learning from Home Office, notification by key partners, or even by watching the news. When you learn about an incident, do the following steps:

Table 9: Alert and Notification Checklist

√	Initial Emergency Communications

	1. Learn about Incident. ERT Leader will get up to speed with the person reporting it, if below is known:
	• What happened?
	• Are emergency personnel involved and to what level?
	• Status of our people:
	   o Is anyone deceased?
	   o Is anyone injured? If so, how badly? Did they require emergency personnel?
	   o Have we already evacuated or sheltered-in-place?
	• Facilities status:
	   o Building damage? (quick initial understanding, before full damage assessment)
	   o Utilities outage or electrical issues? Gas leak? Water leak or flooding?
	• Technology
	   o Is there any technology/IT issue? (if known)
	   o Are any conveyors down? Is there any impact to material handling equipment?

	Notification of ERT
	2. Notify Management Team. ERT Leader or Communications Lead lets the ERT know that there is a problem: quick summary, where to gather (in person or conference bridge). Contact them: • **In Person.** During business hours, notify ERT members in person, and meet immediately in person at the pre-designated command posts. • **Email.** Send an email to ERT members. Refer to **Appendix 1** for ERT contact information. • **Phone Tree.** Communications Lead or any other ERT member can start calling other ERT members. Refer **to Appendix 1** for ERT contact information.
	3. Notify Key Partners who have to be on the call. Some incidents will need input from key partners – submit a ticket, email, or add them to the call. Others just need an FYI that an incident is happening.
	<table><tr><td>• Facilities • IT • Security • Risk Management • Supply Chain</td><td>• Public Relations • Human Resources • Customer Service • Transportation partners</td></tr></table>
	Initial Meeting of ERT
	4. Meet. Set up a conference bridge or gather in person at the pre-designated command posts. See **Appendix 2** for command posts.
	6. What happened? Summarize what is known about the event. (Don't let people get bogged down into details – if the whole team does <u>not</u> need to discuss an issue, have people talk off-line.)

√	Initial Emergency Communications
	7. Life and safety. Identify any urgent life and safety issues – they are of highest priority. • Are people in danger? • Evacuate vs shelter-in-place • Treatment of injured • Potential hazards? (explosives, flammables, structure or shelving collapse, electrocution risk, unsafe road conditions, etc) • Employee accountability
	8. Priorities. Establish priorities on which need to be done first. Update the team as they change.
	9. Who's doing what? Outline roles and responsibilities for Emergency Response Team.
	10. Operational impacts. Are there any leave behinds or overtime?
	10. Reachback or Outreach. Identify what might be needed from Home Office (leadership authorization or decision, supplies/equipment, rerouting to other facilities, etc), or from key partners (local fire/police/medical, transportation, etc). Assign responsibility for who will manage reachback to Corporate, or outreach to key partners, for each.
	11. Key Points for Associates' Notification. • Depending on seriousness of the situation, the ERT Leader will work with senior management, Human Resources, and/or Legal. • ERT Leader will outline key points for associate notification – what information to convey about the situation, and any special instructions (don't come in to work, extra shifts activated, etc), see below. • Identify schedule for Communication Lead to report to ERT on employee accountability reporting schedule. • Communication Lead will create script.
	12. Damage assessment. • Assign who will figure out the scope of damage (to the facility, equipment, inventory). • Complete and send to Risk Management a completed Property Loss report within 24 hours of damage. (Appendix 4)
	13. Quick strategies. Identify any quick fixes to the top priority issues that can be done at the facility level. Identify any decisions or analyses that need to be made at the Home Office level.
	14. Schedule. When is the next meeting (1/2 hour, 1 hour, 2 hours, etc), when updates are due.
	Notification of Associates
	15. Create script. Communication Lead creates a script that hits key points: • Summarize what is known about the event. • Provide special instructions: don't come in to work, extra shifts activated, etc. • Ask associates if they have been directly impacted and any incident-specific issues

√	Initial Emergency Communications
	16. Identify best method for notification. (See **Appendix 1** for contact information.) • In Person. During business hours, it may be possible to notify associates in person, through the hotline, or (with advance notice, such as with weather) tell them to check the phone hotline. • Hotline. Update the facility's phone hotline. • Email. Email can be used with advance notice (for example, in advance of blizzard or hurricane), or when phone networks are not working but data networks are still working, or as a backup for urgent information. • Phone Tree. Phone calls can be used for contacting people during an incident, and after for employee accountability.
	17. Contact associates. Provide information using the script, marking off the employees as they are contacted and making notes on any associates who have been directly impacted and how.
	18. Report to the ERT on employee accountability. Supervisors will report to Communication Lead until all associates have been accounted for. Communication Lead will report to ERT on employee accountability, on the hour until all associates have been accounted for. • Number of associates reached vs. number not yet contacted. • Injuries or fatalities • Other incident impacts (family impacts, inability to get into work, etc)
	Communicate Outward

	19. Report to Corporate. Brief back to Corporate (supply chain management, and any corporate team that has been activated for this event):
	• Description of the incident
	   ○ State if emergency personnel are involved and to what level
	• Status of our people:
	   ○ Identify any fatalities
	   ○ Identify any injuries, severity, and whether they required emergency personnel
	   ○ State if there was evacuation or shelter-in-place
	• Facilities status:
	   ○ Building damage (initial understanding, before full damage assessment)
	   ○ Utilities issue (power outage, gas leak, electrical issues)
	   ○ Anticipated closure of part or all of building (initial understanding)
	• Technology
	   ○ Report any technology impact (if known): IT outage, conveyors, material handling equipment
	• Operational impact
	   ○ Leave behinds or overtime
	• How it's being handled
	• Any needs or requests for Corporate

	20. Report locally. Keep Staples teams informed as incident changes, progress is made, and priorities change. Assign a point person to keep associates informed and aware of how they should respond.
	21. Report with partners. Assign a point person to keep non-Staples partners informed if they are impacted.

3.2. Assess the Situation

The Manager's concern during a crisis is to take care of people and to reduce the impact on customers, operations, facility, and finances. Once an emergency occurs, a FC/DC Manager must have the ability to react to a variety of difficult situations. A competent point person must be on call at all times, with the ability to assess a crisis situation and make instant decisions. Once an incident happens, the ERT must assess what happened, identify a course of action, and react accordingly. This section outlines potential courses of action to take.

Assess	➡	Identify Course of Action	➡	React

3.3. General Courses of Action

Below are the various options the ERT has when dealing with an incident. Section 3.4 identifies specific threats and recommends the recommended range of courses of action for each threat. Courses of action are listed in the following sections.

Call 911	Life & Safety	Operations
•Fire •Police •HazMat	•Shelter in Place •Evacuation	•Close Facility •Workarounds

3.3.1. Call 911

Call 911 for fire, law enforcement, medical emergencies, chemical spills, etc. ***This is generally the right course of action for emergencies that require additional help.*** Please see Section 3.4 for actions in response to specific threats (such as workplace violence, bomb threats, chemical spills, etc).

3.3.2. Shelter-in-Place (Life & Safety)

Shelter-in-place means selecting a small, interior room with no or few windows and taking refuge there. It does not mean sealing off your entire facility. You might order associates to shelter-in-place because of dangerous weather outside such as a tornado, because of workplace violence, or because chemical, biological or radiological contaminants have been released accidentally or intentionally into the environment. You may be told to shelter-in-place by local authorities. ***Individuals may choose to leave instead of sheltering in place, but <u>may</u> <u>not</u> <u>return</u> once they leave***, in order to keep other associates safe.

Refer to ***Appendix 2*** for this facility's shelter-in-place areas. When instructed to shelter-in-place, all people in the facility will gather in the Shelter-in-place areas until the danger has passed. Please follow the below checklist when sheltering in place.

Table 10: Shelter in Place Checklist

√	Shelter-in-Place Checklist
	1. **Follow local officials'** instructions during/after emergencies on sheltering, food, water, clean up.
	2. **Close** the business.
	3. **Shelter.** Bring everyone (including visitors) into the room and shut the doors.
	4. **If anyone chooses to leave**, they cannot return, for the safety of those who stayed inside.
	5**. Close and lock** all openings to the outside (windows, exterior doors, louvers, etc).
	6. **Toxic air:** • Turn off all fans, heating and air conditioning systems, especially if these systems pull in outside air. • If possible in the shelter-in-place space, use duct tape and plastic sheeting to seal all cracks around the doors and any vents in the room. (Note: Shelter-in-place situations usually last a few hours, not days or weeks. There is little danger that the room in which you are taking shelter will run out of oxygen and you will suffocate.)
	7. **Explosion**: If there is danger of an explosion, close the window shades, blinds or curtains and stay low to the ground.
	8. **Tornado or earthquake**: avoid shelving, furniture, machinery, or light fixtures that could fall, and do not open windows.
	9. **Employee accountability.** Write down the names of everyone in the room, and call into Home Office (Supply Chain management, or Security 508-253-5555 US/1-800-663-6391 Canada) to report who is in the room with you, and their affiliation with your business (associate, visitor, client or customer).
	10. **Stay in touch.** Keep listening to the radio or television until you are told all is safe or you are told to evacuate. Local officials may call for evacuation in specific areas at greatest risk in your community.
	11. **Talk it out.** It is normal to feel stressed after a trying situation. Associates should seek free employee assistance program help if needed. (Section 4)

3.3.3. Evacuation & Employee Accountability (Life & Safety)

The Emergency Coordinator will work with the Building Evacuation Coordinator to make sure that everyone in the facility is prepared to evacuate. It is critical that exits are clearly marked and the staff is trained on their responsibilities.

Table 11: Checklist for Evacuation and Employee Accountability

√	Evacuation & Employee Accountability Checklist
	1. **Announce** evacuation by loudspeaker, radio, and in person notification to supervisors
	2. **Turn off** any unnecessary machinery (reduce noise, risk of injury)
	3. ***Call 911***
	4. **Contact Corporate**:
	5. **Evacuation marshals** make sure everyone gets out of the building safely, including those with disabilities and any visitors
	6. **People evacuate** the facility and gather at outside assembly areas
	7. **Employee accountability.** Evacuation marshals take a head count at the assembly areas. • Identify the names and last known locations of anyone not accounted for (including visitors and contractors) • Report on employee accountability to the head of the Emergency Response Team (usually FC/DC Manager) • Identify any issues (missing people, anyone known to be inside, health problems)
	8. **Emergency Response Team** (ERT) works together to verify everyone has evacuated (including visitors and contractors), anyone still not identified, any injuries.
	9. **Work with local authorities.** ERT will be prepared to update local first responders upon arrival about the status of evacuation, injury, etc.
	10. **Secure building**. ERT will secure the building to prevent people entering the site
	11. **Assess situation**. Before allowing anyone to return to work, the ERT will inspect the property with the Fire Chief, engineers (if available), and Home Office facilities rep (optional): • Which areas are safe? • Are there any life threatening situations? • Safe for people to return?
	12. **Offer EAP help.** If the situation was stressful, managers should reassure associates that it is normal to feel stressed after a trying situation, and give all employees information on how to get free employee assistance program help if needed. (Section 4)

3.3.4. Close Facility (Operations)

When it is necessary to close the facility (with advance notice of a threat, such as a pending hurricane, or after an event), facility managers should follow the following checklist:

<div align="center">Table 12 - Closing Facility Checklist</div>

√	Closing Facility Checklist
	1. **Follow the checklist in section 3.1**
	2. **Notify** all associates of the closing (directly or updating building hotline)
	3. **Contact Corporate**: • Supply Chain • Facilities • Security
	4**. Notify delivery and transportation** about the building closure.
	5. **Notify other partners** (directly or through StaplesPartners.com).
	6. **Monitor** the situation.
	7. **Notify all partners once building is opened**. (including Corporate Facilities)

3.3.5. Workarounds (Operations)

Some incidents require identification of workarounds to get work completed, based on the situation. FC Managers will work with Supply Chain to find good workarounds for that situation. The below figure represents some of the options, which include but are not limited to:

- Working with Inventory team to shift new orders to another FC
- Changing shifts (e.g. working longer shifts, working shorter shifts, swapping associates from one shift to another)
- Transferring orders to UPS
- Borrowing qualified associates from other nearby Staples supply chain facilities
- Working with Customer Service to notify customers of the delay to allow them to cancel the order

3.4. Specialized Response to Specific Threats

Facilities face a number of threats that may require specific response beyond the normal procedures for incidents. The below table is a quick guide on some of the incidents facilities may face, and some of the courses of action (see previous section) that are options for the ERT to choose during an incident. The below table is a guide, but it is important to *make a judgment call based on the situation, and on instruction from local authorities*.

Table 13: Potential Options for Incident Response by Specific Threat

Incident Response Options	Call 911	Corporate Fix	Shelter-In-Place	Evacuate	Close Facility	Work-Arounds
Power outage		X				
Medical emergency	X					
Building fire	X			X	X	
Extreme weather/nature – unexpected (tornado, earthquake, wildfire)			X			X
Extreme weather/nature – advance notice (hurricane, tornado, blizzard)					X	
Structural danger (roof collapse, weak structural element)	X	X		X	X	
Personnel shortages (illness, closed schools, snow)						X
Dangerous chemical/radiological release inside Staples facility	X			X	X	
Dangerous chemical/radiological release outside	X		X			
Cyber incident		X				
Workplace Violence	X		X			
Bomb threat or suspicious package	X			X	X	
Explosion outside of Staples property	X		X		X	
Explosion on Staples property	X		X	X	X	
Rioting, civil disorder	X		X		X	
Pandemic, dangerous infection onsite						
Incident at nearby nuclear power plant			X		X	

The following section provides information on threats – ordered roughly from most likely to least likely – and specific information on how to handle that specific threat.

3.4.1. Power Outage

A power outage can happen due to an issue within just the Staples property, or as part of a larger area outage. During an incident, the ERT should consider safety of associates first.

Table 14: Checklist for Power Outage

√	Checklist for Power Outage Inside Staples Property
	1. **Turn off all machines.** After a power outage, supervisors should instruct associates to turn off all non-electric machines (forklifts, cherry pickers, etc).
	2. **Evacuate**. If it is dark inside the facility, supervisors should instruct associates to evacuate calmly and check in at assembly points. • If the weather outside is very hot or cold, associates may be instructed to return in [10, 20, 30] minutes, and to wait in cars or a nearby location (truck stop, restaurant, etc). • Associates may not drink alcohol and return to work.
	3. **Call utilities.** FC Manager should call local utilities company to begin identification of cause.
	4. **Call Corporate**. FC Manager should contact Corporate Facilities to notify of the incident and request any assistance needed.
	5. **Meet.** ERT should meet to discuss the incident, expectations of when power may be restored, any specific needs or issues, and staffing shift reductions or changes.
	6. **Staffing**. FC Manager will inform supervisors if shifts will be reduced, or additional staffing instructions, as they arise.
	7. **Resumption**. Once power is restored: • **Notify associates** when to return. • **Notify Corporate Facilities** that power has been restored
	8. **Test machines**. Before use, electric machines should be inspected for any damage, if the incident could have caused damage.
	9. **Check function**. Before resuming work, check that all systems and equipment are functional. • UPS (Uninterrupted Power Supply) • Computer servers • HVAC • Fire detection and suppression systems • Security and access control systems • Internet • Printers • Conveyors • Scanners • Handheld devices • Warehouse management systems • Vendor software systems • Machines (forklifts, cherry pickers etc) and their connection to floor routes, if applicable • Any additional systems

3.4.2. Medical Emergency

Call 911 *for any serious medical situation.*

Medical emergencies require rapid, calm, well-trained response, in accordance with Safety best practices.

Staples warehouses offer free First Aid training to associates, and should keep and post up-to-date lists of those associates with CPR or First Aid training (Section 2 of this plan). It is recommended that all phones have up-to-date phone lists (lists posted on or near the phone, or attached to the phone cords) with facility-specific medical procedures, on-site emergency medical teams, and names of people with First Aid training.

Following any medical emergency, managers should reassure all employees that it is normal to feel stressed after a trying situation, and offer them information on getting free employee assistance program (EAP) help if needed. (See Section 4 for further information.)

3.4.3. Building Fire

Call 911 for a building fire.

A building fire is one of the biggest risks faced in a warehouse, and can be devastating to associates, inventory, operations, and the local community. Follow the below checklist for a fire.

Table 15: Checklist for Response to Building Fire

√	Checklist for Response to Building Fire
	1. **Evacuate**. Associates should evacuate the area and check in at designated evacuation assembly points. Facility monitors must report on employee accountability on a regular basis.
	2. **Turn off machinery.** When fire alarm goes off, electricity, conveyors, and all machines should be turned off in the vicinity while the source of the fire alarm is investigated.
	3. **Call 911**. If the fire alarm has not automatically triggered a call to local fire department, facility managers should call 911 to report the fire alarm.
	4. **Call Corporate**. Notify Corporate Facilities of the fire alarm, and update as new information is available.
	5. **Work with First Responders.** Facility managers should work with the fire department's Incident Manager, to include: • Report on employees who are known to be inside still, or unaccounted for • Show blueprints or explain facility layout • Report on special hazards (chemicals, explosives, known structural weakness under heat)
	6. **Update Corporate**. As the incident changes or is better understood, report to Corporate with status update.
	7. **Damage Assessment**. Follow this plan's Damage Assessment section. (Appendix 4)
	8. **Recovery**. Follow this plan's Recovery section.
	9. **EAP**. Managers should reassure all employees that it is normal to feel stressed after a trying situation, and provide all employees with information on how to seek free employee assistance program (EAP) help if needed. (Section 4)

Building Fire Pre-Planning Checklist

It is vital to conduct regular fire preparedness checks as part of a larger safety program (see below checklist), and to be prepared to respond to a building fire (see following checklist).

Table 16: Fire Safety Pre-Planning Checklist

Self-Inspection Checklist
Fire Protection

Date Inspected _____ Date Completed _____

Checklist	Needs to be Addressed	Completed	Not Applicable
Is your **local fire department familiar** with your facilities, its location, and any specific hazards?			
If you have a **fire alarm system, is it properly certified**?			
Is that **fire system tested at least annually**?			
If you have **interior stand pipes and valves**, are they **inspected regularly**?			
If you have **outside stand pipes and valves**, are they **inspected regularly**?			
If you have **outside private fire hydrants**, are they flushed at least once a year as part of a **preventative maintenance schedule**?			
Are **fire doors and shutters in good operating condition**?			
Are **fire doors unobstructed** and protected against obstructions, including their counterweights?			
Are **fire doors and shutter fusible links in place**?			
If you have an **automatic sprinkler system. . .**			
Are the **water control valves** as well as the **air and water pressure checked weekly** or **periodically** as required?			
Is the **maintenance of** those **automatic sprinkler systems** assigned to **responsible persons** or to a sprinkler controller?			
Are the **sprinkler heads protected by appropriate metal guards** when exposed to physical damage?			
Is **proper clearance** maintained **below the sprinkler heads**?			
Do you have the **adequate number and type of portable fire extinguishers**?			
Are the **fire extinguishers** mounted in **readily accessible** locations?			
Are **fire extinguishers recharged regularly** and is the inspection tag annotated properly?			
Are the **employees periodically instructed** in the use of fire extinguishers and fire protection procedures?			

This checklist is NOT all-inclusive. You should add to them or skip parts that are not applicable to your company. Carefully consider each item, and refer to OSHA standards for complete and specific guidelines that may apply to your work environment. This list is typical for general industry, not construction or maritime. Please contact NATIONAL SAFETY COMPLIANCE for any training or safety supplies you may need.

NATIONAL safety
www.osha-safety-training.net
1.877.922.7233

3.4.4. Extreme Weather or Act of Nature

For extreme weather or acts of nature, the focus is first on keeping associates safe. How to do this depends on whether it is unexpected or whether there is advance notice. Facility managers must evaluate the situation and decide what the safest course of action is.

Unexpected. Unexpected weather or acts of nature can include tornado, earthquake, wildfire, and blizzard without advance notice. For unexpected weather or acts of nature, the focus is first on keeping associates safe. During work hours, this may mean:

- Sheltering in place inside if it is safer than leaving (such as for a tornado), or
- Evacuating from the facility and from the property if the facility is in a dangerous path (such as a wildfire), or
- Evacuating the building if the inside is more dangerous (such as with structural collapse due to an earthquake or blizzard's snow build-up).

Advance Notice. Sometimes weather or acts of nature are known about in advance, which allows facility managers time to plan on course of action. Advance notice may be available for most hurricanes, most blizzards, some wildfires, and some tornados. Generally with advance notice, keeping associates safe means closing the facility, so that associates are not caught on the roads or while at work, and so that associates can prepare for the weather with their families at home.

3.4.5. Structural Collapse

The facility's structure may become weak due to a number of reasons – buildup of snow on the roof, failure of a vital structural element, or damage from a hurricane or tornado. If the facility is affected during non-work hours

Table 17: Checklist for Structural Collapse

√	Checklist for Response to Structural Collapse
	During Non-Work Hours
	1. **Evacuate anyone on-site**. Anyone on-site during non-work hours (including security) should evacuate the area, assemble with other associates at designated evacuation assembly point.
	2. **Call 911.** Anyone on-site during non-work hours should call 911 immediately after evacuating, and describe the situation. Tell the dispatcher if anyone is still thought to be inside.
	3. **Notify managers.** Tell supervisors or managers about the situation.
	4. **Managers report to the building.** Facility managers should report to the facility to inspect. Be safe and do not enter damaged areas without engineering all-clear.
	5. **Call Corporate.** Notify Corporate Facilities with initial information.
	6. **Coordinate with first responders**. Facility managers should work with the fire department's Incident Manager, to include: • Report on employees who are known to be inside still, or unaccounted for • Show blueprints or explain facility layout Report on special hazards (chemicals, explosives, known structural weakness)
	7. **Notify associates**. Contact associates and tell them not to report to work.
	7. **Damage Assessment**. Follow this plan's Damage Assessment section. (Appendix 4)
	8. **Recovery**. Follow this plan's Recovery section.
	9. EAP. Even with no direct impact, managers should reassure all employees that it is normal to feel stressed after a trying situation, and provide all employees with information on how to seek free employee assistance program (EAP) help if needed. (Section 4)
	During Work Hours
	1. **Evacuate**. Associates should evacuate the area and check in at designated evacuation assembly points. Facility monitors must report to the ERT on employee accountability on a regular basis.
	2. **Turn off machinery.** If possible, electricity, conveyors, and all machines should be turned off.
	3. **Call 911**. Facility managers should call 911 to report structural collapse and any known people hurt by the collapse. Tell the dispatcher if anyone is still thought to be inside.
	4. **Call Corporate**. Notify Corporate Facilities with initial information.
	5. **Work with first responders.** Facility managers should work with the fire department's Incident Manager, to include: • Report on employees who are known to be inside still, or unaccounted for • Show blueprints or explain facility layout • Report on special hazards (chemicals, explosives, known structural weakness)
	6. **Update Corporate**. As the incident changes or is better understood, report to Corporate with status update.
	7. **Damage Assessment**. Follow this plan's Employee Assistance Program and Damage Assessment sections.
	8. **Recovery**. Follow this plan's Recovery section.
	9. **EAP**. Managers should reassure all employees that it is normal to feel stressed after a trying situation, and provide all employees with information on how to seek free employee assistance program (EAP) help if needed. (Section 4)

3.4.6. Personnel Shortages

Personnel shortages seriously impact operations. This can be the result of illness (such as when a nasty bug is going around, or a pandemic), closed schools that force single parents to stay home, or snow that both blocks roads and closes schools.

Table 18: Checklist for Personnel Shortages

| √	Checklist for Personnel Shortages
	1. **Notify.** Supervisors should notify Operations Manager or FC/DC Manager if there are serious personnel shortages in their areas.
	2. **Workarounds.** If there are personnel shortages across multiple areas, facility managers may look for alternatives: • Shift qualified and cross-trained associates from one area to another, based on priority of work and deadlines.
	3. **Call Corporate.** Notify Supply Chain management of the problem, and work together to identify potential strategies for filling orders, such as: • Request qualified staffing from a nearby Staples warehouse • Work with facility managers at a near-by Staples warehouse to transition some orders • Notify customers of the delay • Work with vendors to arrange direct-to-customer shipping • Arrange for shipping between nearby stores

3.4.7. Chemical Release

DOT Emergency Response Guidebook (ERG) for Dangerous Goods/Hazardous Materials Transportation Incidents

Emergency Response Guidebook, also referred to as the ERG. This guide book aids first responders (firefighters, police, and others) in quickly identifying the specific or generic hazards of the materials involved in the event of a spill incident. This guidebook helps protect first responders and the general public during the initial response phase of the spill incident. Our delivery drivers aren't first responders, however hazmat transporters must provide emergency response information found in the ERG.
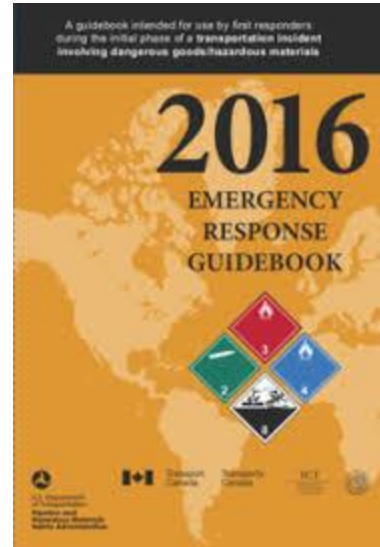
A current ERG must be on hand in every:

- Every delivery vehicle (including leased and rentals.
- Every FC.
- Every SDO location.

Employees should use this guide book to:

- Quickly identify the material(s) involved in an incident
- Protect themselves and the general public during the initial response phase
- Provide emergency response information

All hazardous materials going over DOT controlled roads or rails have to have placards showing what type of hazard it is and showing a UN identification number. If you can see that placard, and you have an ERG handy, you can turn to the yellow pages in the ERG (chemicals organized by number). If you know the name of the chemical but don't have that number, you can go to the blue pages (chemicals organized by name). The DOT ERG will provide a Guide number and outline basic response activities – how far to get away, personal protective equipment, response protocols, etc. The following table outlines ERG contents:

Yellow	List of dangerous goods in numeric order by 4-digit ID number.
Blue	List of dangerous goods in alphabetical order.
Orange	Safety Recommendations (i.e., First Aid, fire and spill response info).
Green	Provides recommended safe isolation/protective action distances.
White	How to use the Guidebook during an incident and a glossary.

Spill Kits

Along with a copy of the ERG book, Spill Kits should be kept in every delivery vehicle and warehouse location. If you need to order spill kits, please contact our hazmat vendor.

Delivery Spill Kits. Delivery vehicle should keep a spill kit either behind the seat of the cab or at the rear of the cargo box for immediate access.

These kits contain:
- Protective gloves
- Socks or booms to build a dam around the spill
- Square pads to absorb and contain the spill
- Large plastic bag to place all used supplies

Warehouse Spill Kits. Warehouse locations should keep several Spill Kits - by the battery charging station, in shipping and receiving in larger warehouses, in maintenance shop, and in returns areas.

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F4CUS SAFETY

Loss Prevention Guidance Document

Hazardous Waste Accumulation & Disposition – Spill Kits

With the continuing growth in the chemical category the amount of product that presents a safety risk is increasing in each Staples location. It is important that our locations have a spill plan available to ensure that the safety of all associates is protected and to keep regulated material from entering the solid waste stream. To facilitate that process an adequately stocked spill kit is critical. Each location must maintain an adequate number of these kits in the vicinity of stocked product, on the dock, in returns and in the designated waste accumulation area. Our SDO & Retail operations must have at least (1) kit in the designated accumulation area.

The basic components of a spill kit can be acquired from the most cost effective supplier available. However, recommended suppliers have been provided below. A basic 5 gallon plastic pail can be utilized for storage of the spill kit components and should be marked: **SPILL KIT**. An inventory list must be created and taped inside the lid of the pail. Monthly inspection of the spill kit to ensure that all necessary items are present is required. When constructing a spill kit it must contain the following items:

- Chemical resistant apron - Safety Today KM97790
- Goggles (w/side shields) - Safety Today Aspect/Centurion
- Chemical resistant gloves - Safety Today AN37-145
- Non-reactive/low-dust absorbent - StrongPak 3 pound shaker bottle
- Absorbent booms and/or pads in lieu of powdered material noted above
- Broom - Staples
- Dustpan - Staples
- Containment bags – StrongPak Supplied UN Spec/DOT bags. Place 1-2 of each size into the spill kit so that if the kit is being carried to the location of the spill everything necessary is readily available.
- Container liner - Staples
- Sharpie for writing spill contents on containment bags - Staples
- Paper towels - Staples

The spill kit described in this guidance document will facilitate proper containment and disposal with the selected Hazardous Waste vendor. Keep the kit stocked at all times and replenish as materials are used or disposed of.

GlobalLossPrevention

Chemical Emergency Spill Response

√	Checklist for Chemical Spill
	Driver Emergency Spill Response
	1. The most important thing in a Hazmat emergency is that you **do not put yourself in harms way**!
	2. **Call SDO/dispatch immediately** and notify the Regional Safety Manager
	3. **Identify Chemical.** Before beginning cleanup, identify Material Safety Data Sheets (MSDS). **Shipping Declaration** **ERG Book**
	4. If you're not sure what to do or if the area is unsafe…stay away! **Your safety is most important!**
	5. **Only if the area is safe and you feel comfortable cleaning up the spill,** do you proceed with clean-up.
	6. **Contact Chemtrec** (**redacted** – listed on shipping declaration) to obtain information on how to properly deal with a chemical spill or exposure.
	7. **Obtain proper personal protective equipment (PPE)** from the spill kit.
	8. **If safe, contain** and clean-up the spill, per ERG and Chemtrec
	Warehouse Emergency Spill Response
	1. The most important thing in a Hazmat emergency is that you **do not put yourself in harms way**!
	2. **ERG:** Have ERG book on hand.
	3. **Risk Assessment:** Evaluate the type of material spilled and identify the source.
	4. **MSDS:** Identify Material Safety Data Sheets (MSDS). If you are unable to locate the MSDS please forward your request to: redacted **Shipping Declaration** **Occupational Safety Website** (redacted). Staples has developed an Occupational website and contracted the services of redacted to obtain MSDS. To search for a product MSDS select one of the following radio buttons: - Keyword - Item Number (Staples 6 Digit) - Manufacturer - Brand **3E COMPANY** - redacted **COASTWIDE Buildings** - redacted
	5. **If unable to identify chemical**, don PPE from Spill Kit, secure the area, place caution tape around affected area, and place booms down to prevent material spread
	6. **Notify** the Asset Protection Manager/Safety Manager.
	7. **Management** will determine if the spill/release is too large to cleanup, or creates a safety emergency that results in a building evacuation and the proper authorities notified.
	8. **If you feel comfortable cleaning up the spill**, use Spill Kit materials and wear Personal Protective Equipment to quickly contain.
	9. **Protective Clothing:** Wear appropriate PPE from Spill Kit
	10. **Containment:** Place socks or safety sorbent particulate around spill to prevent from spreading
	11. **Begin Clean up:** Cover with pads, pillows or safety sorbent to reduce vapors. Turn pillows/pads over to completely saturate and apply safety sorbent directly on spill and agitate in a circular motion with a broom.
	12. **Disposal of Used Material:** Placed used sorbents in disposal bag and be sure to dispose of used absorbents in accordance with Local, State, and Federal regulations.

3.4.8. Major Cyber Incident

Redacted

3.4.9. Workplace Violence

According to the Departments of Labor and Justice, annually approximately two million people throughout the country are victims of non-fatal violence at the workplace, and fatal workplace violence includes 1,000 workplace homicides each year. Violence against employees occurs in a variety of circumstances and situations including: robberies and other crimes, actions by frustrated or dissatisfied clients and customers, acts by disgruntled co-workers or former co-workers, and domestic incidents that spill over into the workplace.

The Department of Labor recommends a 3-level approach that is consistent with the level of violence or threatened violence, as outlined below. Potential or actual violent situations among employees usually escalate if not defused. Violence and the warning signs that typically occur can usually be identified at three levels. It should be noted that any one or combination of warning signs at the three levels may be indicative of a potentially violent situation. The following is an attempt to delineate warning signs and the appropriate response. There is no fail-safe way of presenting this information to employees. Employees will have to make a judgment call as to the appropriate action to take by discerning and evaluating the given situation. ***SAFETY FIRST!***

Levels of Workplace Violence and Recommended Response

The Department of Labor identifies levels of violence or pending violence, and identifies warning signs and how to handle the situation. See below for how to handle a workplace violence issue.

Definition

Workplace violence is any intentional conduct that is sufficiently severe, offensive or intimidating to cause an individual to reasonably fear for his or her personal safety or the safety of his or her family, friends and/or property. This severe, offensive or intimidating conduct creates a hostile, abusive or intimidating work environment for one or more associates.

Examples of workplace violence include, but are not limited to, the following:

- Threats or acts of violence occurring on Company premises, regardless of the relationship between the parties involved in the incident.
- Threats or acts of violence occurring off Company premises involving someone who is acting in the capacity of a Company representative.
- Threats or acts of violence occurring off Company premises involving an associate if the threats or acts affect Staples' business interests.
- Workplace violence does **not** refer to occasional comments of a socially acceptable nature. (Such comments may include references to legitimate sporting activities, popular entertainment or current events.) Rather, it refers to behavior that is personally offensive, threatening or intimidating.

Staples Policy

Staples Policy on Workplace Violence, HR040 (effective 02-01-2013)

Policy Highlights:

- Associates are prohibited from engaging in any acts or threats of violence against other associates, contractors, customers or visitors in the workplace.
- Policy violations may result in disciplinary action up to and including termination.
- To report policy violations, associates can place confidential calls to the Ethicspoint Hotline.
- Reporting Workplace Violence
- Associates must inform their supervisor, Loss Prevention, Asset Protection or their local Human Resources representative of any threats or acts of prohibited conduct as soon as possible. Associates may place confidential calls to the Ethicspoint Hotline to report violations of this policy, threats, or other prohibited conduct under this policy.
- Associates who have issues or concerns related to workplace violence may also contact the Company's Employee Assistance Program (EAP) .

Danger Signs

Behaviors of Concern
These behaviors do not necessarily lead to violence, but if not addressed, these behaviors of concern could possibly lead to violence. Managers should have a conversation to get more information, and if concerned call the Ethicspoint Hotline or file a report.

- Anger (prolonged, not temporary)
- Holding grudges
- Hypersensitive to criticism
- Blaming others
- Collecting injustices
- Preoccupied with violence
- Obsessions
- Extreme anxiety
- Extreme sadness (especially with thoughts of suicide)
- Change in behavior (such as from friendly and outgoing, to quiet and disengaged)

Extreme Behaviors
Any of these must be *reported immediately* to the Ethicspoint Hotline or file an report. If the threat feels immediate, call **911** immediately.

- Threats (direct or implied, spoken or written)
- Physical violence against another person
- Physically aggressive acts (shaking fists at another person, kicking, pounding on something, punching a wall, angrily jumping up and down)
- Having any weapon on Staples property.
- Damaging, destroying, or sabotaging property
- Intimidating or frightening others
- Stalking, harassing, or showing unwelcome focus on another person
- Verbal abuse (screaming, cursing)
- Threats of suicide

Triggers to Violence
Often, there is a trigger that leads someone with behaviors of concern to violence. Closely watch anyone with behaviors of concern if these events happen, and be prepared to call911 or the Ethicspoint hotline or file a report.

- Reprimanded
- Terminated (fired) or laid off
- Financial troubles
- Separation or divorce
- Death in the family
- Series of imagined slights or insults

Active Shooter - Run, Hide, or Fight

When an Active Shooter is in your vicinity, you must be prepared both mentally and physically to deal with the situation. You have three options, in this order:

	Run, Hide, Fight
√	**1 - Run**
	Have an escape route and plan in mind.
	Leave your belongings behind.
	Evacuate regardless of whether others agree to follow.
	Help others escape, if possible.
	Do not attempt to move the wounded.
	Prevent others from entering an area where the active shooter may be.
	Keep your hands visible.
	Call 911 when you are safe. Tell 911:
	Location of the active shooter.
	Number of shooters.
	Physical description of shooters.
	Number and type of weapons shooter has.
	Number of potential victims at location.
√	**2 - Hide**
	Hide in an area out of the shooter's view.
	Lock door or block entry to your hiding place.
	Silence your cell phone (including vibrate mode) and remain quiet.
√	**3 - Fight**
	Fight as a last resort and only when your life is in imminent danger.
	Attempt to incapacitate the shooter.
	Act with as much physical aggression as possible.
	Improvise weapons or throw items at the active shooter.
	Commit to your actions -- your life depends on it.
√	**When law enforcement arrives**
	Remember: when police arrive on scene, they don't know who you are.
	Make it clear you're not a threat!
	Keep hands visible at all times.

	Run, Hide, Fight
	Stay calm and follow instructions.
	Drop items in your hands (bags, jackets).
	Raise hands and spread fingers.
	Avoid quick movements toward officers
	Do not hold on to them for safety.
	Do not point, scream or yell.
	Do not ask questions when evacuating.
√	**What to expect from the police**
	The first officers to arrive on scene will not stop to help the injured or comfort people. Expect rescue teams to follow, who will treat and remove the injured.
	Once you have reached a safe location, you likely will be held in that area by law enforcement until the situation is under control and all witnesses have been identified and questioned. Do not leave the area until law enforcement authorities have instructed you to do so.

3.4.10. Bomb Threat

If you receive a telephoned bomb threat, you should do the following:

Table 19: Bomb Threat Checklist

√	Bomb Threat Checklist
1.	**Follow the posted bomb threat checklist.** (see the next page)
2.	**Get as much information from the caller as possible**. If they let you, ask the following questions and write down everything they say: • When is the bomb going to explode? • Where is it right now? • What does it look like? • What kind of bomb is it? • What will cause it to explode? • Did you place the bomb?
3.	Write any **background noises** or **voice characteristics** (accents, apparent age, gender, etc)
4.	**Get help.** • *Call 911*, or (if you are still on the phone with the caller) get someone to call 911 immediately. • Notify **management** about the bomb threat, and that you have called 911.
5.	**Evacuate.** For all bomb threats, management must evacuate the facility.
6.	**Check gathering points**. Evacuation gathering points must be checked before personnel can gather there.
7.	**Help search.** In coordination with law enforcement and if requested, management will organize a search of the building and grounds.
8.	**Let first responders take lead.** If a device is discovered, first responders will take lead on device deactivation and disposal.
9.	**Employee Assistance**. Managers should reassure any impacted associate(s) that it is normal to feel stressed after a trying situation, and make sure that all employees know how to seek free employee assistance program (EAP) help if needed. (Section 4)

Pre-Planning for Bomb Threat

Incident planners should post the following bomb threat checklist near all phones.

Table 20: Bomb Threat Call Procedures Poster

3.4.11. Suspicious Packages

Incident planners should post the following suspicious packages poster in any location in which mail and packages are handled. Be wary of suspicious packages and letters. They could contain explosives, chemical or biological agents.

Table 21: Suspicious Package Poster

3.4.12. Explosion

An explosion can be accidental (fire near compressed gas containers) or deliberate (sabotage or criminal activity). Response to an explosion will depend on whether it happened inside or outside of the Staples warehouse; generally an internal explosion will trigger evacuation, while an external explosion will trigger shelter-in-place.

Explosion Inside Staples Warehouse

Facility response should follow the below checklist:

Table 22: Checklist for Explosion Inside Staples Facility

√	Checklist for Explosion Inside Facility
	1. **Evacuate**. Associates should evacuate the area and check in at designated evacuation assembly areas. • Keep an eye out for suspicious packages, especially near the posted assembly areas. • Facility monitors must report to facility managers on employee accountability on a regular basis, until all associates, on-site contractors, and visitors are accounted for.
	2. **Call 911**. Facility managers should call 911. Tell the dispatcher: • Summary of what happened • If known, what the explosive substance is and if there is more that could explode. • If known, if there are toxic chemicals that may require a special HazMat response. • Known injuries and if anyone is still thought to be inside
	3. **Turn off machinery.** If possible, electricity, conveyors, and all machines should be turned off.
	4. **Call Corporate**. Notify Corporate Facilities with initial information.
	5. **Work with first responders.** Facility managers should work with the fire department's Incident Manager, to include: • Report on employees who are known to be inside still, or unaccounted for. • Show blueprints or explain facility layout. • Report on special hazards (chemicals, explosives, known structural weakness).
	6. **Update Corporate**. As the incident changes or is better understood, report to Corporate with status update.
	7. **Damage Assessment**. Follow this plan's Employee Assistance Program and Damage Assessment sections.
	8. **Recovery**. Follow this plan's Recovery section.
	9. **Employee Assistance**. Managers should reassure any impacted associate(s) that it is normal to feel stressed after a trying situation, and make sure that all employees know how to seek free employee assistance program (EAP) help if needed. (Section 4)

Explosion in the Area (Not Inside Staples Warehouse)

With an explosion in the surrounding area - outside of the facility - sheltering in place is usually the recommended course of action.

Table 23: Checklist for Explosion Outside Facility

√	Checklist for Explosion Outside Facility
	1. **Shelter in place**. Associates should shelter in place.
	2. **Call 911**. Facility managers should call 911. Tell the dispatcher: • Summary of what happened, if known • Notify that you are sheltering in place and rough head count
	3. **Turn off machinery.** If possible, electricity, conveyors, and all machines should be turned off.
	4. **Call Corporate**. Notify Corporate Facilities with initial information.
	5. **Update Corporate**. As the incident changes or is better understood, report to Corporate with status update.
	6. **Damage Assessment**. Follow this plan's Employee Assistance Program and Damage Assessment sections.
	7. **Recovery**. Follow this plan's Recovery section.
	8. **Employee Assistance**. Managers should reassure any impacted associate(s) that it is normal to feel stressed after a trying situation, and make sure that all employees know how to seek free employee assistance program (EAP) help if needed. (Section 4)

3.4.13. Rioting or Civil Disorder

During working hours, rioting or civil disorder outside of the facility should usually involve sheltering in place and enhancing security. During off hours, management should evaluate the situation to decide if the facility should stay closed until the danger has passed.

Table 24: Checklist for Rioting or Civil Disorder

√	Checklist for Rioting or Civil Disorder
	1. **Shelter in place**. Associates should shelter in place until the situation has passed.
	2. **Call 911**. Facility managers should call 911. Tell the dispatcher: • Summary of what happened, if known • Notify that you are sheltering in place and rough head count • Request for police presence if possible
	3. **Fortify security**. • Consider instituting lock-down (no entry or exit) • Notify security company • Close gates, if applicable • Reinforce doors and windows if they are at risk
	4. **Call Corporate**. Notify supply chain management and Corporate Facilitie with initial information.
	5. **Notify partners**. Explain what is known of the situation, actions being taken, and check on their safety. • Drivers • Collocated units (sales, furniture, etc)
	6. **Update Corporate**. As the incident changes or is better understood, report to Corporate with status update.
	7. **Guarded Evacuation**. If the situation continues for an extended period: • Request police presence. If not possible, work with Corporate to get security contractor on site. • Evacuate personnel. For safety, this may mean bussing with guards.
	8. **Evaluate when it is safe to return.**
	9. **Damage Assessment**. Follow this plan's Employee Assistance Program and Damage Assessment sections.
	10. **Recovery**. Follow this plan's Recovery section.
	11. **Employee Assistance**. Managers should reassure any impacted associate(s) that it is normal to feel stressed after a trying situation, and make sure that all employees know how to seek free employee assistance program (EAP) help if needed. (Section 4)

3.4.14. Pandemic or Dangerous Contagious Infection Onsite

A pandemic, epidemic, or dangerous contagious infection can expose our people to harm, create panic, and hurt public image. Infectious events can directly impact staffing by making associates sick, or indirectly by making associates unwilling to report to work out of fear of getting sick. Further, a contagious infection can create public panic – such as was seen with 2014 Ebola infections – and so could impact sales, if customers feared that inventory could be contaminated.

It is important to remain calm, protect privacy where possible, and **work closely with corporate and with local public health officials** before taking action on any infectious event. For example, if an associate or on-site contractor reports that he/she has been diagnosed with tuberculosis, facility management may want to get more information from public health on how to deal with this situation. Local public health would not be able to talk about the specific person involved (for privacy reasons) but can explain any steps to take to keep everyone safe, and may take the lead on an epidemiological investigation. To maintain privacy, do not reveal the name of the person with the disease to other associates, unless instructed by local public health. To sum up – for diseases, follow the lead of local public health, and keep corporate in the loop.

Mandatory reporting: While some diseases must be reported to local public health by labs or medical facilities, **Staples is not required to report diseases**.[1] However, local public health is always a good resource for concerns, and to talk through how to handle an incident.

Public health contact information can be found at these websites:
- US: http://www.cdc.gov/mmwr/international/relres.html.
- Canada: http://www.phac-aspc.gc.ca/emergency-urgence/index-eng.php.

For [Facility], contact the [State/Province] Bureau of Infectious Diseases: [Contact number]

Checklist for Pandemic or Dangerous Contagious Infection Onsite

Table 25: Checklist for Pandemic or Dangerous Contagious Infection Onsite

√	Checklist for Pandemic or Dangerous Contagious Infection Onsite

	1. Pre-planning: when there is a known dangerous infectious event going on (avian flu, Ebola, tuberculosis) but no infections on-site.
	• Contact corporate leadership to get input from Human Resources and corporate emergency planners
	• With corporate, identify guidelines on any special workplace steps, using guidance from:
	    o Centers for Disease Control and Prevention (CDC)
	    o Local public health
	    o World Health Organization (WHO)
	• Corporate may recommend specific measures (hand sanitizer stations, having face masks and thermometers to hand)
	• With corporate, identify key messages for managers, associates, contractors, partners, etc.

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[1] Per Massachusetts Infectious Diseases epidemiologist Matt Osbourne, phone conversation 12/5/2014.

√	Checklist for Pandemic or Dangerous Contagious Infection Onsite

	2. **Pre-planning: Communicate with associates and onsite contractors in advance**, in line with corporate instructions. Instructions may include things such as:
	• How this specific pathogen (infection-causing germ) works and is spread, symptoms
	• How they can prevent infection
	• Instructions for what to do if they are sick, such as:
	    o Do not come in to work if you are sick with symptoms [list the applicable symptoms, including any thresholds like fever of 100.4º F/38º C]
	    o If you feel sick at work, notify manager and go home until symptoms are gone

	3. **Notification of infection.** • Notice of an infection may come from many sources: directly from the ill person or their family, from a manager, from local public health (if the infection was identified at a hospital and epidemiologists are tracing backward), or even from the news.

	4. **Contact:**
	• **Public health** – get advice on how to handle the incident, and follow the lead of public health. Find the state's public health department contact information:
	http://www.cdc.gov/mmwr/international/relres.html.
	• **Corporate**
	    o Supply Chain leadership
	    o Human Resources
	    o Loss Prevention
	    o Public Relations
	    o Emergency planners

	4. **Follow public health lead.** • If local public health epidemiologists are involved, <u>let local public health take the lead on privacy issues</u> - *they* may ask for all contacts of a specific person or release the name publicly • Public health epidemiologists will provide guidance, or will take over the incident response • Monitoring, isolation or quarantine measures • Identify who may have been exposed • Appropriate medical countermeasures and treatment (disinfection of people, vaccines, medications, antiviral drugs, antibiotics, antitoxins, etc) • Facility disinfection and sanitization
	5. **Notify associates.** • The priority is on stopping the spread of a dangerous infection, but remember to safeguard privacy where possible • In general, <u>do not release the name to associates or to the public</u>. For example, say "an associate tested positive for X", not "John Smith". Let public health release names, if applicable. • Provide associates with broad information on what happened, measures being taken by Staples, measures they can or must take (in alignment with public health and corporate direction)

	6. **With corporate, mitigate operational impacts.**
	• With particularly panic-inducing infections (like Ebola), the public may react irrationally and refuse to shop at <u>any</u> Staples due to fear of contamination. Discuss with corporate what are good alternatives:
	    o Fill orders from a non-impacted facility
	    o Treat impacted inventory as medical waste (even if it can be cleaned effectively – customers likely wouldn't want even a thoroughly decontaminated Ebola printer)
	    o Work with corporate PR to publicize our measures to keep customers safe.

	7. **Damage Assessment**. Follow this plan's Employee Assistance Program and Damage Assessment sections.
	8. **Recovery**. Follow this plan's Recovery section.

√	Checklist for Pandemic or Dangerous Contagious Infection Onsite
	9. **Employee Assistance**. Managers should reassure any impacted associate(s) that it is normal to feel stressed after a trying situation, and make sure that all employees know how to seek free employee assistance program (EAP) help if needed. (Section 4)

3.4.15. Radiological or Nuclear Release

Radiological or nuclear incidents have very low probability, and widely varying consequences. The Federal government has planned for a coordinated response to a nuclear/radiological incident (see the Nuclear/Radiological Incident Annex to the National Response Framework). Our main focus is to **stay calm**, **reduce exposure**, and **follow authorities'** instructions (local and Federal authorities) for the specific situation. This section will first focus on actions to take during a radiological or nuclear event, and then provide background information on potential incidents, and the kinds of radiation.

Actions to Take During Radiological or Nuclear Incident

The most important things to remember in a radiological or nuclear incident is that dangerous exposure factors in "**time, distance, shielding**" –it is important to reduce the time of exposure, distance to the threat, and shield from the threat. Following a radiological release or explosion, associates should:

Table 26: Checklist for Radiological or Nuclear Incident

√	Checklist for Radiological or Nuclear Incident
	1. **Stay calm** and listen for information from local authorities.
	2. **Shelter in place** if possible (unless otherwise ordered by authorities), and stay calm. Inside a building is one of the safest places to be during a radiation incident – the building walls help to provide shielding.
	3. **Cover your mouth and nose** with a dry tissue, filter, or cloth to avoid inhaling or swallowing the radioactive material.
	4. **Reduce outside air.** Engineers should temporarily turn off HVAC intakes or fans/louvers to reduce the introduction of contaminated air, and then evaluate how long to leave HVAC or fans/louvers intakes off.
	5. **If you suspect you were exposed** – do not eat, drink, or smoke. This makes sure that no radioactive material enters the mouth, where it can be most dangerous.
	6. **Minimize** the time you are exposed to the radioactive materials.
	7. **Maximize** your distance from the source; walking even a short distance from the scene could provide significant protection since dose rate drops dramatically with distance from the source.
	8. **Shield yourselves** from external exposure and inhalation of radioactive material.
	9. **Stay away from** any obvious plume or dust cloud.
	10. **Listen to local authorities.** Most first responders carry radiation detection equipment and can provide additional instructions. They will usually oversee movement from the place of exposure, and conduct decontamination (usually removing contaminated clothing and washing skin with water).
	11. **Stay connected.** Continue to listen for official instructions regarding what to do.
	12. **Once released**, if there was any exposure to radioactive materials, seek medical evaluation and treatment.
	13. **Employee Assistance**. Managers should reassure any impacted associate(s) that it is normal to feel stressed after a trying situation, and make sure that all employees know how to seek free employee assistance program (EAP) help if needed. (Section 4)

Radiological (Dirty Bomb) – What Is It?

According to the Department of Homeland Security, radiological events (like a "dirty bomb") would most likely mostly cause panic while causing only minimal harm. A dirty bomb is the commonly used term for a radiological dispersion device (RDD), which is a conventional explosive bomb (such as dynamite) packed with radioactive materials so that they are dispersed during the explosion. If there is enough radioactive materials, a dirty bomb could also require an area to be shut down for cleanup.

Nuclear Incident – What Is It?

Nuclear incidents (like a nuclear power plan incident) are far less likely, but the effects can be quite severe. A nuclear incident could include a true nuclear bomb (like Hiroshima) or a release of high-grade radioactive materials from a nearby nuclear plant.

What is Radiation?

We come into contact with background radiation every day as part of our normal lives – whether from outer space, from naturally occurring materials in the earth, or from our own bodies. Human industry creates additional radiation, for medical, industrial, scientific, and other uses.   In the context of an incident that may cause harm to associates, it is important to understand the major kinds of radiation, how they act, how they can be blocked, and what their consequences are. Children and fetuses are at the highest risk of acute (short-term exposure to high levels) radiation exposure.

Radiological hazards can be divided into three general forms (source EPA.gov):

- **Alpha** radiation: Most alpha radiation occurs naturally in the environment (nearly all rocks, soils, water have alpha radiation); it does not usually penetrate skin and can be shielded by paper and clothing (and by solid materials like walls); causes the most danger when inhaled, swallowed, or absorbed through open wounds (e.g. radon exposure); usually only travels a few inches in air. Examples: radon-222, americium-241, plutonium-236, uranium-238, thorium-232, radium-226, polonium-210.
- **Beta** radiation: moderately penetrating; can redden or burn skin; clothing provides some protection; causes the most danger when inhaled or swallowed; can travel several feet in air and is easily stopped by solid materials like walls. Can have acute effects from short periods of high exposures, but most health risk is from long exposure (5-30 years) to lower levels of beta radiation. Examples: strontium-90, carbon-14, tritium, and sulfur-35.
- **Gamma** (or **X ray**) radiation: usually the source of "radiation sickness"; highly penetrating through most materials; can travel many feet through air and travel all the way through a human body; requires dense shielding materials like lead. Examples include iodine-131, cesium-137, cobalt-60, radium-226, and technetium-99m.

4. Phase 4: Recovery

4.1. Employee Assistance Program (EAP)

It is normal to be affected by an upsetting situation – even professional first responders get counseling after difficult calls. Help is available to you.

Following any stressful incident, managers should make sure that all full-time or part-time associates know that free, confidential EAP counseling and referral services are available to them <u>and</u> their immediate families.

After an upsetting incident or threat, people often have strong feelings that can disrupt their lives, such as difficulty with processing negative experiences, anxiety or fear of a similar situation happening again, grief, or other difficult thoughts. Facility managers should provide information on the assistance Staples provides through our Employee Assistance Program (EAP).

EAP assistance is available to all full-time associates, all part-time associates, and their immediate family members.

Associates and their families can reach this <u>free</u>, completely <u>confidential</u> assistance by redacted.

EAP provides confidential counseling and referral services to help you get through life's unexpected complications and manage day-to-day tasks better. EAP provides personal assistance for your health, finance and life balance.

Depending on your issue, the EAP may refer you to a counselor who is not part of the EAP. This treatment may be covered by your medical plan. The EAP can help you understand your options, if a referral is required.

4.2. Damage Assessment

Damage assessment has several key portions: identifying hazards following an incident, identifying the scope and details of damage from the incident, and coordinating with Home Office's supply chain and risk management contacts. Damage assessment should be done with a team of knowledgeable facilities persons (including engineers if available), operations specialists, IT analysts, and individual(s) familiar with the facility.

Refer to Appendix 4 for the details of damage assessment. Conduct damage assessment with the checklist and Staples Risk Management's Property Loss report form, and be careful of water damage and its potential health effects.

5. Appendix 1: Contact Information – Private Data

Contact information for the Emergency Response Team, Staples Home Office, and key partners will be ***updated at least annually***. Please remember that ***home and cell phone numbers is "Private" data***, and have to be handled according to the Staples Privacy and Information Management (PIM) Policy.

5.1. Facility Contact – Emergency Response Team (Management)

Below are all of the facility management team, including anyone on the Emergency Response Team (ERT).

Table 27: Contact List for Facility's Emergency Response Team

Emergency Response Team Contact List						
Name (Last, First)	**Title**	**Work**	**Home**	**Cell**	**Email**	**Notes**

5.2. Staples Home Office - Key Contacts for an Emergency

Table 28: Staples Corporate Standing Contact Lines

Corporate Standing Hotlines			
Area	Phone	Email	Notes
Facilities			
Security			
IT			
Risk Management			
Supply Chain			
Public Relations			
Human Resources			
Customer Service			

5.3. Corporate Supply Chain Contact Information

NAC Supply Chain & Logistics			
Title	**Name**	**Office Phone**	**Cell Phone**

5.4. Facility Contact List – All Associates and Onsite Contractors

Notification to associates will be done by management areas – supervisors and managers will report upward on the status of associates and onsite contractors.

Table 29: Phone Tree

5.4.1. Location of Associate Contact Information

[Provide as much information as you might need in an emergency – who keeps lists, where they are kept in electronic and hard-copy.]

Format	On-Site	Off-Site
Hard-Copy		
Electronic		

5.5. Local Partners' Contact Information

Table 30: Contact List for Facility Local Partners

Local Partners' Contact Information		
Role	**Group Name**	**Phone**
Fire Department		
Emergency Medical Service (if different from fire dept)		
Hazardous Materials team (if different from fire dept)		
Police or Sheriff		
Utilities Companies serving this facility		
Hospital		
Plumber		
Electrician		
HVAC Contractor		
Security Company		
Security Guard Services		
Engineering		
Shipping		

6. Appendix 2: Maps for Command Posts, Evacuation, Shelter in Place

6.1. Evacuation Assembly Areas (Muster Points)

Evacuation muster points are where associates go in an emergency. Managers are responsible for employee accountability at the muster points.

Evacuation Muster Points	Description
[Muster Point 1]	[Describe the location and put a picture if needed. Choose a place outside, nearby but outside of danger.]
[Muster Point 2]	

6.2. Command Posts

6.2.1. Command Posts Inside Facility

Inside the facility, the Emergency Response Team will handle the incident by gathering at [name location – if needed, provide a picture (a cell phone snap is fine – just enough so everyone knows where to go)].

Table 31: Interior Command Post

Interior Command Post	Description
[Location 1]	[Describe the location and put a picture if needed. Choose a place outside but nearby, say for a fire confined to the building – such as a guard shack or corner of the parking lot with good cell and radio coverage.]

[Picture here]

6.2.2. Command Posts Outside Facility

If the interior of the facility is not safe, the Emergency Response Team will gather outside to handle the location at:

Table 32: Exterior Command Post #1

Exterior Command Post	Description
[Location 2]	[Describe the location and put a picture if needed. Choose a place outside but nearby, say for a fire confined to the building – such as a guard shack or corner of the parking lot with good cell and radio coverage.]

[Picture here]

Table 33: Exterior Command Post #2

Exterior Command Post	Description
[Location 3]	[Describe the location and put a picture if needed. Choose a place outside but nearby, say for a fire confined to the building – such as a guard shack or corner of the parking lot with good cell and radio coverage.]

[Picture here]

6.3. Blueprints

[Copy/paste blueprints here. Identify as many of the features from section 2.3.5 as possible.]

6.4. Shelter in Place Areas

The Shelter-in-place area is:

Table 34: Shelter In Place Areas

Shelter-in-Place Area	Description
[Location 1]	[Describe the location and put a picture if needed.]

[Picture here]

[In advance, each facility should choose and label a "Shelter-in-Place" area (or several), label it/them, and include training on Shelter-in-place in annual safety training]

7. Appendix 3: Associate Training

On an annual basis, the Emergency Coordinator should conduct training for associates, and practice facility evacuation. Additionally, the Emergency Coordinator should provide specific training for Emergency Marshals and Facility Emergency Medical teams, as well as recognize those volunteers in front of management and other associates for their extra work and responsibility.

This section provides an outline of subjects to cover. The following section has a one-pager on associate emergency training, to be supplemented with facility-specific information:

- The names of personnel with specific responsibilities,
- Maps for evacuation,
- Location of shelter-in-place areas, and
- Facility emergency medical teams.

Staples FC/DC Associate Emergency Training

In an emergency, the safety of our people is the most important focus. This training explains some of the key ways in which we can be prepared for emergencies.

EVACUATION

What is Evacuation?

Evacuation has to do with leaving the building safely when there is an emergency. Once safely outside, associates go to the assembly areas and check in with Evac Monitors.

Evacuation Maps

The facility Emergency Coordinator has posted evacuation maps around the facility, and will provide these maps at this training.

Evacuation Marshals

Evacuation Marshals are associates who volunteer to help other associates evacuate safely and efficiently, and keep track of who has checked in at the evacuation points so that management can know if anyone is still inside. Speak with the Emergency Coordinator to volunteer to be trained as an Evacuation Marshal, which is a position of responsibility.

Disabilities Planning

Some people may have special needs, like poor hearing or vision, temporarily or permanently being in a wheelchair or needing crutches, or other issues. Evacuation Marshals should let the Emergency Coordinator know if there are any associates who need special planning.

SHELTER IN PLACE

What is Shelter in Place?

Shelter-in-place means protecting yourself from an outside danger by going to an interior room and taking refuge there. It does not mean sealing off the entire facility, or going to a shelter.

Why Should You Shelter in Place?

Management may tell you to shelter-in-place when there is a danger outside, and staying inside protects you. This could be because of sudden dangerous weather like a tornado, because of the potential for workplace violence, or because of a plume of dangerous chemicals outside.

How to Shelter in Place?

When told by management to shelter in place, calmly go to the Shelter In Place area and stay there until the danger is past. Management will report to Corporate about what is going on, and will monitor the situation until it is safe for people to leave the Shelter in Place area.

What If I Want to Leave?

You may choose to leave instead of sheltering in place, but may not return while there is still a danger, in order to keep other associates safe.

MEDICAL EMERGENCIES

First Aid Training

Associates who would like free First Aid training, speak with your supervisor.

Facility Emergency Medical Teams

First Aid trained associates may volunteer to be part of the emergency medical team on-site. They do initial evaluation of what happened, call 911, and give medical support until the ambulance arrives.

8. Appendix 4: Damage Assessment

Damage assessment has several key portions: identifying hazards following an incident, identifying the scope and details of damage from the incident, and coordinating with Home Office's supply chain and risk management contacts. Damage assessment should be done with a team of knowledgeable facilities persons (including engineers if available), operations specialists, IT analysts, and individual(s) familiar with the facility. Conduct damage assessment with the following checklist and Staples Risk Management's Property Loss report form, and consider health effects of water damage (following).

Table 35: Damage Assessment Checklist

√	Damage Assessment Checklist	Damage		Severity			Notes
	Safety Precautions	Yes	No	High	Med	Low	Notes
	1. Be careful! Watch for hazards	-	-	-	-	-	
	2. Turn off electricity	-	-	-	-	-	
	3. Turn off natural gas	-	-	-	-	-	
	4. Assess the exterior for stability before entering the facility	-	-	-	-	-	
	5. Avoid sparks or open flames. Use non-sparking light sources (flashlights, floodlights) and do not smoke in the area	-	-	-	-	-	
	6. Wear proper Personal Protective Equipment, including hard hat and respirator	-	-	-	-	-	
	7. Do not touch exposed wires or lights	-	-	-	-	-	
	8. Be careful of tripping or slipping	-	-	-	-	-	
	9. If there is water damage, wear a respirator	-	-	-	-	-	
	Assess Structural Damage	Yes	No	High	Med	Low	Notes
	10. Roof - damage, displacement, or removal						
	11. Foundation - gouges, cracks, splits, water damage						
	12. Exterior - damage to vents, chimneys, air ducts						
	13. Exterior walls - damaged or unstable						
	14. Interior walls damaged or unstable?						
	15. Windows						
	16. Floor						
	17. Debris						
	18. Flooding or water damage						
	19. Sewage or plumbing damage						
	20. Are above-ground platforms, ladders, and grating safe for use?						

√	Damage Assessment Checklist	Damage		Severity			Notes
	21. Furniture and furnishings						
	22. Inventory						
	23. Other						
	Assess Technology Damage	Yes	No	High	Med	Low	Notes
	24. Power/electric systems						
	25. Conveyor belts						
	26. HVAC systems						
	27. Computer systems, including UPS						
	28. Printers						
	29. Copiers						
	30. Other						
	Additional Damage	Yes	No	High	Med	Low	Notes

8.1. Insurance and Property Damage/Loss

Submit to Risk Management a completed Property Loss report within 24 hours of damage.

Redacted

8.2. Health Concerns About Water Damage

Proper water damage restoration is imperative, but there is more to water restoration than extracting water from the carpet and pad. Controlling and terminating the growth of bacteria, mold and mildew is the primary concern. According to the American Lung Association,

Standing water remaining from any flood is a breeding ground for microorganisms. Water damaged building interiors provide a prime environment for the growth and reproduction of bacteria, viruses, and mold, which can become airborne and be inhaled, putting people at risk for lung disease. One of the favorite foods for bacteria and mildew is the decaying organic jute backing of carpets. This, coupled with warm humid air, creates the ideal environment for reproduction. Mold and mildew may cause allergic reactions such as puffy eyes, chronic cough, rheumatism, asthma, headache, depression, and arthritis. Further, in the long-term, dampness in buildings and furnishings promotes the growth of cockroaches and dust mites, which can trigger allergic reactions and asthma attacks.

In terms of the interior building temperature, it is important to note that mildew growth is highly affected by temperature; bacteria is also affected by temperature and grows best at 75ºF/24ºC, but some bacteria can survive below freezing and over 150ºF (66ºC). *It is best to avoid interior building temperatures between 75ºF - 85ºF (24ºC - 29ºC)* as that is mildew and bacteria growth sweet spot.

Table 36: Temperatures and Optimum Mildew/Bacteria Growth

Under 75ºF (24ºC)	75ºF - 85ºF (24ºC - 29ºC)	85ºF – 115ºF(29ºC - 46ºC)	Over 115ºF (46ºC)
Mildew Not Active	**Mildew Grows Best**	Mildew Not Active	Mildew Dies
Some Bacteria Die, Some OK Below Freezing	**Most Bacteria Grows Best**	Some Bacteria Are Fine	Some Bacteria Are Fine

Water damage restoration must be performed by trained technicians who understand proper procedures and chemical applications. Trained personnel will provide the necessary adjustments to the environment by altering temperature and humidity levels to deter production of mold, mildew and bacteria.

The FC/DC Manager must remain alert for the following signs of microbial growth:
- Musty, stuffy odors
- Black/gray patches along the bottom of walls
- Deterioration of jute backing on carpeting and/or dust covers on the bottom of furniture

8.3. Initial Facility Repair/Fixes Before Resuming Operations

After the disaster has been abated and the building has been stabilized, it is the Manager's responsibility to have the building repaired and operational as quickly as possible. By working with the Restoration

Contractor and the Insurance Adjuster, prompt decisions regarding the scope and value of the loss can be made. Once the scope has been agreed upon, the work can begin.

Don't let the determination of fault delay the process of getting the building back in operation. The main goal is to repair the damage.

Generally, the insurance company will approve the repairs, even if caused by the negligence, and subrogate the claim later with the responsible party. The Manager, of course, should assist the IA in such a claim by providing all relevant information.

Some of these recommendations will obviously need to be handled by trained and experienced professionals so as to minimize damage and control losses. However, your Maintenance staff may handle some items. In all cases, being familiar with the techniques for handling various types of damage will ensure that your building is properly restored.

Table 37: Checklist for Facility Restoration Before Resuming Operations

√	Checklist for Facility Restoration Before Resuming Operations
√	**What to do before entering**
	1. **Be sure the power is off**. Generally, the power company will have been called to the scene and will have terminated the power. If not, shut off the power to the affected area before entering.
	2. **Be sure the natural gas is off.**
	3. Conduct a small safety meeting with those planning to enter the area: • If there has been any structural or ceiling damage, DO wear hard hats. • Wear hard soled shoes, not sneakers. • If the building is still smoking or smoldering, wear respirators. • If there is water damage, wear respirators
	4. Beware of plaster, light fixtures, and other debris falling.
	5. Be careful not to slip on wet flooring.
√	**What NOT to Do Immediately After an Incident**
	6. **DO NOT** enter any affected area and light a match. Light must be provided by non-sparking flashlights. NO SMOKING!
	7. **DO NOT** enter any area without permission from the Incident Commander (Fire Chief, Police, etc)
	8. **DO NOT** attempt to wash walls, ceilings or other porous surfaces until given the ok.
	9. **DO NOT** use electronic equipment or appliances until checked and cleaned, if at all.
	10. **DO NOT** use upholstered furniture until checked and cleaned. Much of the damaged materials and furnishings will have to be discarded because of the spread of contaminated water. Simply drying out the water will not remove most contaminants or the microorganisms.
√	**What to Do After a Fire**
	11. Open all windows for ventilation. If available, insert a firebox fan into the window for high power ventilation.
	12. Clean and protect metal surfaces (i.e. chrome and brass trim) with a light coating of petroleum jelly or other oil to inhibit oxidation of the metal surfaces.
	13. Brush or vacuum smoke particulate from furnishings, draperies and carpet in DRY areas.
	14. Drain all heating, plumbing and sprinkler systems during the winter in regions where freezing can occur. Pour antifreeze into all traps.
	15. Follow the guidelines described under "Water Damage" below to further protect your property.
√	**What to Do After Water Damage**

√	Checklist for Facility Restoration Before Resuming Operations
	Water damage can occur due to firefighting techniques, burst plumbing lines, a leaky roof, etc. Often with a fire, there is more damage caused by the water than the fire itself.
	16. Workers should wear respirators to prevent exposure to dangerous micro-organisms.
	17. **DO NOT** turn the heat up high. Too much heat can actually accelerate damage. Try to maintain an even temperature of 72ºF / 20ºC.
	18. Locate the source of the water and shut it off.
	19. Follow the water pathway and mark all water-damaged areas.
	20. Poke small weep holes in wet ceilings to allow the water to drain. Be sure to place buckets underneath.
	21. Remove furnishings if possible. Those items most greatly and immediately affected by water damage include: • Electronic equipment • Anything made of wood or cellulose fibers • Books
	22. Block up furnishings that cannot be moved to a dry location. Pieces of wood or styrofoam are good for this task. Be careful not to place anything with a dye or color in it on wet carpeting.
	23. Spray electronic systems (elevators, generators, security system control panels, etc.) with a recommended critical contact cleaner. This will prevent the corrosion of electronic components.
	24. Access ductwork to dry it. Properly treat ductwork with antimicrobial treatment so that mold, fungi and bacteria do not regenerate in air handling equipment and ductwork systems. Pay close attention to crumbling pipe insulation and ceiling material that may contain asbestos.
	25. Apply antimicrobial treatment to any other water affected areas.
	26. Begin removing water. • Extract carpeting. • Towel dry furnishings with absorbent cloths. • Open drawers and doors of furniture to prevent them from swelling shut but do not force.
	27. Immediately inventory damaged items. Salvage value is generally assessed by the insurance adjuster.
	28. Once damaged items have been inventoried, remove, dry or clean them. Items that may be salvaged should be able to be cleaned and to dry completely in 24 to 48 hours.
	29. Open drywall at the bottom of walls to allow air movement and drying within the wall.
	30. Remove wet fiberglass insulation, if necessary, or dry it if possible.
	31. Take care of wet flooring. • Lift carpet and install carpet dryers. • Remove and discard wet padding. • Be sure to wear gloves when removing tack strips. Serious infections can occur from the bacteria inherent with water damage if the skin is punctured. • If hardwood floors are covered with carpeting, the carpet must be removed and the floor beneath it dried.
	32. Dehumidification - Ordinary household type dehumidifiers will not properly dry down your building. Professional dehumidifiers use hot gas bypass or desiccant systems to remain operable at any temperature. Dehumidification combined with air movement caused by using high-speed turbo fans will minimize further damage, both for structure and equipment (computers, phones, copiers, etc)