

Exposure Risk Assessment Form

Assessment Completion Details

Completed by (name): Tom Banta _____ Date: 12/7/2020

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Employee job classifications evaluated in this assessment:

Retail workers, including store managers or leaders, brand ambassadors/sales associates, and stockroom employees.

Questions and Answers

Can employees telework or otherwise work remotely? How are employees encouraged or empowered to use those distance work options to reduce COVID-19 transmission at the workplace?

Store associates who work at American Eagle or Aerie stores in Oregon are unable to telework or work remotely.

What are the anticipated working distances between employees? How might those physical working distances change during non-routine work activities?

Six (6) feet, however there may be times that store employees are less than 6 feet away from other employees.

The following safety procedures are followed when social distancing cannot be maintained:

- mandatory mask use by all employees;
- frequent cleaning of the store throughout the day; and
- frequent hand washing.

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What is the anticipated working distance between employees and other individuals? How might those working distances change during non-routine work activities?

Six (6) feet, however there may be times that store employees are less than 6 feet away from other individuals, including when interacting customers. The following safety procedures are followed when social distancing cannot be maintained:

- mandatory mask use for all employees and customers;
- frequent cleaning of the store throughout the day;
- availability of hand washing stations in the store;
- removal of fixtures from the sales floor to increase social distancing;
- plexiglass barrier at the cash registers; and
- store signage (stickers on the floor and marketing) promoting social distancing and directing the customers what it expected of them in the store.

How have the workplace or employee job duties, or both, been modified to provide at least 6-feet of physical distancing between all individuals?

The workplace has been modified by adding floor markers and Line Queing Markers to encourage social distancing, removing fixtures on the floor that would impede social distancing guidelines,

Additionally, all stores have installed Plexi barriers to create a safe social distance between the cashier and guest while processing transactions at the register.

To further encourage social distancing, the store return process has been modified by adding in a return bin on the guest side of the cash register so that the items are not handed directly to the employee. Return bins have been installed to support with managing returns outside of the store to encourage social distancing and limiting the number of individuals within the store. Returned items are steam cleaned or quarantined for 24 hours before they are processed.

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How are employees and other individuals at the workplace notified where and when masks, face coverings, or face shields are required? How is this policy enforced and clearly communicated to employees and other individuals?

Employees have been informed of the face covering policy via our internal communication system, Zipline and during in-person meetings. There are multiple signs and posters throughout the stores regarding the requirement to wear a mask, face covering, or face shield, as well as the proper way to wear them both outside of the store's entrance and in the store.

Employees are made aware that failure to follow these policies will result in discipline, up to and including termination. Customers who do not wear a mask can be refused service in the store and are encouraged to use online or curbside shopping as alternative options.

How have employees been informed about the workplace policy and procedures related to reporting COVID-19 signs and symptoms? How might employees who are identified for quarantining or isolation as a result of medical removal under this rule be provided with an opportunity to work at home, if such work is available and they are well enough to do so?

Employees have access to all workplace policies and procedures related to COVID-19 on Zipline as well as on AEO's COVID-19 resource page. Associates have also received periodic reminders and updates about the safety policy and procedures via Zipline.

Moreover, associates are directed to take a symptom checker self-assessment before each shift to ensure that any associate who is not feeling well stays home.

Any associate who is in quarantine or isolation is unable to work from home due to the nature of these positions. However, associates are referred to Benefits to determine whether there are any leave entitlements for which they may be eligible.

How have engineering controls such as ventilation (whether portable air filtration units equipped with HEPA filters, airborne infection isolation rooms, local exhaust ventilation, or general building HVAC systems) and physical barriers been used to minimize employee exposure to COVID-19?

The Shopping Centers or the Administration will be in charge of providing ventilation to ensure the conditioning and adequate air flow. As required, AEO will comply with any applicable air filtration standards. Additionally, we have provided Plexi barriers at the cash registers to minimize employee exposure.

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How have administrative controls (such as foot-traffic control) been used to minimize employee exposure to COVID-19?

Each store has a Store Max Capacity, which has been set to limit the number of individuals (including employees and customers) that are allowed in the store at a time. A Greeter uses a tally counter app to track all individuals in the store to identify when the store's capacity is met.

There are also Line Queuing Markers 6 feet apart at the store's entrance, fitting rooms, and the cash register. If there is a line, the Greeter uses the time to introduce the safety measures in the store and inform guests that they need to wear a mask upon entry. There are also floor markers throughout the store to encourage social distancing.

We have also implemented in-store and curbside pickup to reduce the number of individuals entering the store or the amount of the time customers spend in the store.

Finally, we have changed our break practices so that only one person can be at the break table at a time, and prohibited the sharing of lockers.

What is the procedure or policy for employees to report workplace hazards related to COVID-19? How are these hazard reporting procedures or policies communicated to employees?

Employees are directed to report any and all workplace hazards to their manager, Human Resources Business Partner, and/or the Company's Compliance hotline (by phone or through the internet). Reports can be made anonymously.

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How are sanitation measures related to COVID-19 implemented in the workplace? How have these sanitation practices been explained to employees and other individuals at the workplace?

AEO has implemented new measures and enacted new cleaning guidelines due to COVID-19. Hand sanitizer and gloves are available at the cash registers, and associates wear gloves during each transaction, wipe down the surface with disinfectant spray after guest interaction, and wipe down the pin pad and pen with a sanitizer wipe or disinfecting spray after each use.

Each store has also setup a Sanitation Center at th entrance of the Stockroom, which is an area for cleaning and safety supplies. The floor is marked every 6 feet for social distancing.

There is also a new cleaning protocol that is followed each day before the store is opened, throughout the day, and after the store closes.

These sanitation practices were explained to employees in a re-onboarding training session, and have been communicated through Zipline and during in-person meetings. The practices are also emphasized during each shift. Finally, there are posters regarding sanitizing practices including cleaning practices and overall well-being reminders in line with CDC guidance.

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How have the industry-specific or activity-specific COVID-19 requirements in Appendix A of this rule and applicable guidance from the Oregon Health Authority been implemented for workers? How are periodic updates to such guidance documents incorporated into the workplace on an on-going basis?

In accordance with the industry-specific COVID-19 requirements for retail stores, AEO has done the following:

Physical Distancing Measures: limited number of customers in the store in order to maintain at least 6 feet of distance; added curbside pickup; placed Plexi barriers in front of cashiers; used floor markers to maintain physical distancing;

Masks, Face, Shields and Face Coverings: AEO requires employees, patrons, and visitors over the age of 5 to wear masks, face coverings, or face shields.

Sanitation and Cleaning: Frequently cleaning and sanitizing work areas, high-traffic areas, and commonly touched surfaces in both the customer and employee areas of the stores; using a return bin and setting aside returns for 24 hours before they are steamed and available for purchase; providing hand sanitizer in the store and near fitting rooms; sanitizing fitting rooms between use to the extent they are used.

Signage: AEO has posted clear signs that (1) list COVID-19 symptoms and asking employees and visitors to stay home if they are feeling symptoms; (2) encourage physical distancing, and (3) provide information about mask, face covering, or face shield requirements.

All guidance documents are updated on a regular basis as required by the developing situation. Current versions are maintained on Zipline, and are communicated to associates via Zipline and in meetings with store leadership.

In settings where the workers of multiple employers work in the same space or share equipment or common areas, how are the physical distancing; mask, face covering, or face shield requirements; and sanitation measures required under this rule communicated to and coordinated between all employers and their affected employees?

The Shopping Centers or the Administration will be in charge of providing ventilation to ensure the conditioning and adequate air flow. As required, AEO will comply with any applicable air filtration standards. Additionally, we have provided Plexi barriers at the cash registers to minimize employee exposure.

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How can the employer implement appropriate controls that provide layered protection from COVID-19 hazards and that minimize, to the degree possible, reliance on individual employee training and behavior for their efficacy?

A risk assessment was conducted and appropriate controls/mitigation efforts were implemented. We are constantly monitoring the situation in our stores and, in partnership with the store management team, make updates to the risk assessment as needed.