

# COVID-19 Infection Control Plan

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Oregon OSHA's temporary rule for COVID-19 (OAR 437-001-0744) requires all employers to develop and implement an infection control plan. This plan builds upon each employer's exposure risk assessment, which the rule also requires, and aims to eliminate or otherwise minimize worker exposure to COVID-19. The specific requirements for this COVID-19 infection control plan are outlined under subsection 437-001-0744(3)(h). This plan does not include the additional elements required for exceptional risk workplaces.

American Eagle Outfitters, Inc.

Date: 12/7/2020

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All job assignments or worker tasks requiring the use of personal protective equipment (including respirators) necessary to minimize employee exposure to COVID-19.

Interacting with public and other employees;

Working cash register;

Receipts and Buy Online Ship to Store ("BOSS") processing; and

Stocking and re-stock merchandise.

The procedures we will use to ensure that there is an adequate supply of masks, face coverings, or face shields and personal protective equipment (including respirators) necessary to minimize employee exposure to COVID-19.

Our Global Asset Protection and Non-Merchandise Procurement Center have partnered to ensure we have an adequate supply of PPE, including masks. We have partnered with a third-party vendor who stores and distributes PPE for our store associates across the country. As an additional protection, we have additional masks at one of AEO's distribution centers and also have cleaning supplies that we have purchased but are still in the possession of the seller in case of an emergency.

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The specific hazard control measures that we installed, implemented, or developed to minimize employee exposure to COVID-19, listed and described.

AEO has mandated:

- frequent handwashing or use of hand sanitizer;
- physical distancing;
- use of face coverings or masks for employees and customers;
- frequent cleaning and disinfecting practices implemented throughout the store; and
- symptom checker and temperature screening prior to the start of shift.

Additionally, AEO has:

- limited the number of individuals (employees and customers) in the stores;
- installed Plexi barriers at cash wrap;
- placed floor markers for line queing at the store entrance, the cash register, the fitting room, and throughout the store to encourage physical distancing;
- placed other health and safety signs regarding COVID-19 symptoms and the face covering requirement;
- removed fixtures to allow for physical distancing;
- limited breaks to one person at the table;
- prohibited the sharing of lockers;
- trained employees on these health and safety practices.

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Description of our COVID-19 mask, face covering, and face shield requirements at the workplace, and the method of informing individuals entering the workplace where such source control is required.

All individuals in the store, including employees and guests/customers, must wear a mask or face covering. AEO has placed a sign at the entrance of the store regarding this requirement, and there is a store associate at the entrance to remind guests of this requirement.

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The procedures we will use to communicate with our employees and, other employers in multi-employer worksites, regarding an employee's exposure to an individual known or suspected to be infected with COVID-19 to whom other workers may have been exposed. This includes the communication to individuals identified through COVID-19 contact tracing and general communication to the workplace at large.

All COVID-19 positive cases are reported to asset protection and human resources. Human resources will contact the COVID-19 positive associate to instruct them to isolate and remain home from work in accordance with CDC guidance, as well as determine who has been in close contact with the individual. Human resources then contacts anyone identified as having been in close contact with the COVID-19 positive associate, while ensuring the identity of the COVID-19 positive associate remains confidential.

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The procedures we will use to provide our workers with the initial employee information and training required by 437-001-0744.

COVID-19 resources and the required employee information have been or will be communicated via our internal communication system, Zipline. Since the beginning of the pandemic, we have also been including information on COVID-19 in monthly Safety Spotlights and will continue to do so. Employees training acknowledgements electronically through our online platform, AEO Academy, or signing a paper form.

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Oregon OSHA's Administrative Rule 437-001-0744 Addressing COVID-19 Workplace Risks is available at [osha.oregon.gov](https://www.osha.oregon.gov).

Exposure Risk Assessment requirements are in 437-001-0744(3)(g).

Infection Control Plan requirements outlined in this document are in 437-001-0744(3)(h)(B)(i)-(vi).

COVID-19 information and training requirements are in 437-001-0744(3)(i), and as applicable for workplaces at exceptional risk, 437-001-0744(4)(b).