

PREVENTION MEASURES



ANTI-COVID-19 HEALTH PROTOCOL





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COVID-19 Prevention Measures

Contingency Plan

Preventive measures

We have developed a Contingency Plan with all the actions that we are going to carry out to maintain the facilities in a perfect state of cleanliness and disinfection, with the aim of ensuring the health of our guests and employees at all times.

This Contingency Plan includes all COVID-19 protocols and actions set out in the rules, guidelines and recommendations of Basque Government Health Authorities, as well as those of the Government of Spain, applicable to our employees, guests and suppliers.

This Contingency Plan is permanently updated and adapted to current regulations, as well as to the recommendations of COVID-19 protocols.

The Carlton Hotel is employing special COVID-19 disinfectant equipment and products to carry out the proper disinfection and preventive steps to allow us to ensure a healthy, COVID-19 protected hotel for our guests and employees.

Specific equipment: disinfectant foggers, CO2 meters and other equipment.

Disinfectants: Quimxel sanitiser gel (>70%), Quimxel Descol disinfectant, Laboratorios Bilper textile sanitiser, Eurosanex Lubacin hydrogen peroxide based oxygen cleaner and others.

All Hotel Carlton employees have been instructed about and made aware of the need to comply with this Contingency Plan and follow safety guidelines both in the workplace and in the private sphere.

For Anti-COVID-19 safety reasons, it is forbbiden for people who are not registered in the room to meet there.

The **use of the rooms** is exclusively restricted to the people included in the reservation details (one, two, or three, depending on the reservation).

If you were to hold any sort of meeting that is not appropriate to the use of the room and including people who are not expressly authorised by the hotel, we will be forced to inform the Ertzaintza (Basque Police), in compliance with the current regulations, and your stay will be terminated.





General rules for all staff members

- All Hotel staff is to undergo monthly compulsory COVID-19 serological testing.
- The body temperature of all personnel is to be taken daily on entry to the workplace and recorded (Annex 0). There is a Staff Body Temperature Check Point at Reception. Those whose body temperature exceeds 37.5 °C will not be allowed to enter, triggering the Contingency Plan for cases of infection.
- Physical contact among employees is to be avoided at all times, and prescribed social distancing should be maintained.
- All Hotel Carlton employees must wear face masks that are suitable for the length of time they are to be used and follow a strict hand disinfection protocol.
- Each department is to have special bins to collect protective equipment waste.
- No common working implements, telephones, pens, etc. may be shared unless previously disinfected.
- Street clothes should never be mixed with uniforms, and appropriate steps should be taken to ensure this.
- All hotel workers shall have the appropriate PPE for their job. (surgical and FFP2 masks, nitrile gloves, safety goggles, gowns, etc.).
- Failure to comply with the company's orders and instructions on safety matters related to COVID-19 (use of masks and other PPE) will be considered a serious offence and will be sanctioned in accordance with the national collective labour agreement in force for the hotel and catering sector.



- Personal hygiene measures are mandatory:
- Wet your hands thoroughly with water.
- Apply soap or gel, rubbing your hands between fingers and under nails.
- Rinse with plenty of water.
- Dry your hands with disposable cellulose.
- Dispose of cellulose residues into a bin, preferably operated with a foot pedal.
- Avoid contact with people who show signs of a respiratory condition, such as coughing and sneezing.
- A minimum distance of two meters should be maintained between people, and even more so with those who exhibit symptoms of acute respiratory infection.
- Cover your mouth with disposable cellulose when you cough and/or sneeze, then wash your hands.
- Avoid touching your nose, eyes and mouth whenever possible.
- In back-of-house areas, employees should also maintain social distancing and the use of the service lifts is limited to one person at a time. All POS terminals must be disinfected after use in case of previous contact.





General rules for

all external personnel/suppliers

- No external person/supplier is to be allowed access to the facilities under any circumstances without the knowledge and prior permission of Hotel Management.
- Face masks and safety distance (2 m) are required throughout the Hotel premises.
- Under no circumstances will the company provide PPE to personnel from external companies.
- Under no circumstances will any vehicle have access to the Hotel's garage, which is exclusively for the use of our guests.
- Orders for goods and services should only be collected at a delivery point, accessed through the garage door. Orders that have to be delivered by hand are to be processed in the same way, the person in charge of collecting them doing so at the same point. Non-hotel employees are not allowed inside hotel premises.
- Maintenance suppliers are subject to the same protocol.





Reception

The department's tasks are to be carried out according to the following guidelines:

- Installation of screens at reception desks to separate and protect during daily dealings with guests.
 - All customer service counters and those that require intensive direct communication with guests are to be equipped with protective screens, and disinfected, together with their supports, at least twice per shift; and such disinfection should be recorded. (ANNEX I).
- All employees in the department are to be provided with necessary protective measures, face masks, hand sanitiser and nitrile gloves.
 - It is mandatory that hands be disinfected, preferably with hand sanitiser, before entering or exiting changing rooms.
 - In the changing rooms, there should be a single collection point for waste PPE.
- Individual workstations should be arranged with personal tools for private use.
 - As far as possible all employees should use personal tools. In those cases where tools are passed on at shift change, they are to be disinfected
- When employees and guests coincide in the same place, social distancing (2 m) should be maintained at all times.
- The department is to have thermometers available to measure the body temperature of staff and guests, as well as CO² meters to determine the need for ventilation.
- Employees are to clock in and out using a personal record sheet.





- The department is to have protective items such as hand sanitiser and face masks for the exclusive use of guests.
- There is a Disinfection Point with hand sanitiser and DESCOL disinfectant dispensers next to the front desk and hotel reception for the exclusive use of guests.
- The premises are to be suitably signposted to ensure guests maintain social distancing while moving trough them.
- The **distance** between people in the department and common areas should always be **2 metres**.
- Card payments are to be recommended in order to prevent possible infection.
- All customer service counter surfaces should be disinfected regularly, six times a day, twice per shift (1).
- Room keys and pens for guest use are to be deposited in the containers provided, and are to be disinfected prior to further use.
- Coinciding with the end of each shift, all working items are to be disinfected (1):
 - Telephones.
 - Pens.
 - Copiers.
 - Keyboards.
 - Screens.
 - Safes.
 - Button panels.
 - And, in general, any multiple use surface or object.









 Transport of luggage and the handling of vehicles is to be exclusively carried out by guests. In those cases where it is necessary for employees to carry out these tasks, they must have their hands protected with gloves at all times, in addition to the mandatory mask, and they are to wash their hands afterwards.

During check in, guests can voluntarily fill in the Guest Health Affidavit form, where their body temperature should also be recorded (APPENDIX 4).

- Uniforms are to be washed following Health Authority recommendations, i.e., daily at 60 °C. Should a uniform not be washable at that temperature for whatever reason, it should be disinfected by other means.
- Staff should be trained in the use of PPE and this should be recorded when it is handed over. (ANNEX 5).
- Mandatory PPE: face masks and nitrile gloves.





Breakfast Service Catering - Room Service

Breakfast Service

Breakfast Service is from 7 am to 10.30 am, Monday to Friday and from 08 am to 11 am, Saturdays, Sundays and holidays.

Breakfast is served in the Arias Room and by means of an Assisted Buffet.

We kindly ask our guests to request a table at the entrance of the room and, once they have their table, they can go to the buffet where Hotel staff will serve them the food products they request.

There is a sanitiser gel and disinfectant station at the entrance of the dining room.

Guests are kindly requested to clean their hands before and after breakfast.

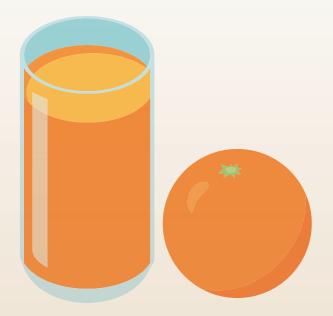
- Exceptionally, as a safety measure, breakfast may be served in the rooms, in which case the tray is to be left and collected at the door in order to avoid contact with guests at all times.
- Staff should be trained in the use of PPE and this should be recorded (Annex 5).
- All common use items, such as salt shakers, cruets, sugar trays, etc. shall be removed.
- All reusable service items are to be treated at the appropriate temperature for complete disinfection.
- All service materials must be washed in accordance to instructions at a single washing point and transported safely to the food processing centre after washing.
- Contact with tableware should be exclusively with nitrile gloves and appropriate protective measures.







- All waste is to be treated in the same way and concentrated at a single point for further treatment.
- Cleaning and disinfection.
 - Once the service is over, all tableware provided with the service must be washed and disinfected, including that which was not used but could have been in contact with the guests.
 - Tablecloths and napkins are to be treated in the same way as the rest of the hotel linen, i.e. cleaned by an industrial laundry service at a temperature above 70 °C, with virucidal detergent-disinfectants.
 - Once the service has finished, we ventilate the breakfast room suitably, making sure that the air in the room is completely renewed and proceed to disinfect and clean it (surfaces, vending machines, coffee machines, door knobs, counters, etc., as well as any surface that may have been touched by hands).
- Mandatory PPE: face masks and nitrile gloves.





Breakfast Service - Catering - Room Service

The Restaurant and Bar Grill will remain closed for the time being and their opening will be confirmed as soon as possible.

Any order of food products from the outside is to be received and handed over directly at hotel reception.

Guests staying at the Carlton Hotel may request a Lunch and Dinner Menu service which will be served in the Salón Arias, following all the safety guidelines and directives set out by the Basque Government's Health Department and Hotel Carlton COVID-19 regulations.

Lunch is from 1.30 pm to 3.30 pm and dinner from 8 pm to 10.30 pm.

Price: €28.00 (10% VAT included).

In addition to these Lunch and Dinner Menu services, you can also request the Tasting Menu, served in an exclusive room, reservation requested (48 hours).

Price €52.00 (10% VAT included).



Room Service

In view restrictions caused by the Pandemic and COVID-19 regulations, we offer our guests our Room Service Menu, from 1.30 pm to 8.00 pm.

Bar Service

Hotel Guests can enjoy this service at the "Luis Garcia Campos" Lounge (First floor). Schedule: From 11,00 am to 08,00 pm.

Maximum capacity for Catering Services

There is a maximum limit of 50% of allowed capacity, with a minimum distance of 1.5 m between people sitting at different tables, and a maximum of 4 people per table.





Gym and Business Centre

Gym

The hotel gym will remain open for our guests as long as Basque Government COVID-19 regulations allow.

When open, maximum capacity will be 2 people.

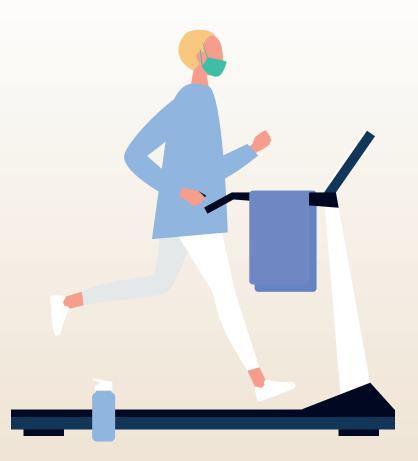
Guests are kindly requested to clean the equipment after use.

Face masks required.

Business Center

Maximum capacity: 1 person.

Face masks required.





Housekeeping

Rooms and common areas

The department's tasks are to be carried out according to the following guidelines.

- Every day, middle managers are to give all employees in the department the PPE for the working day (a face mask, nitrile gloves, safety goggles and hand sanitiser).
- All employees should maintain a safe distance (2 m) from clients and other employees.
- The hotel will provide guests in their rooms with a safety kit consisting of a face mask and hand sanitiser.
- In back-of-house areas, employees are to follow the same social distancing rules as in front-of-house areas. Likewise, the use of the service lifts is also limited to one person at a time, including any tools used for their work.
- Uniforms should be washed following Health Authority recommendations, i.e., daily at more than 60 °C. Should a uniform not be washable at that temperature for whatever reason, it should be disinfected by other means.
- Staff should be trained in the use of PPE and this should be recorded (Annex 5).
- Chambermaids should not clean the rooms while the guests are inside. In cases where it is strictly necessary, it should be carried out following the rules regarding contacts and social distancing.
- All personnel in this department are to use masks for their own protection (changed daily) and gloves (changes after cleaning each room).
- The cleaning and disinfection protocol should be visibly posted in all service rooms on all floors.
- Mandatory PPE: face masks and nitrile gloves, and, in case of suspected infection, safety goggles and gown.





Rooms

After rooms have been used by guests, they should be cleaned and disinfected as per the specifications of the new cleaning manual drafted by Hotel Management (Annex 6).

Standards to be applied to minimise COVID-19 risks:

- There is to be a single waste bin in each room. It should be pedal-operated, fitted with an individual bag and located in the bathroom.
- For safety reasons, we have reduced the number of amenities available in the room. Do not hesitate to ask us for any other items you may need (shaving kit, dental kit, etc.) by calling 722.
- We have similarly removed all minibar products.
- When guests check out, rooms are to be properly ventilated and disinfected in accordance with health and safety regulations. Particular emphasis should be placed on all surfaces and equipment that may be subject to increased contact. The hotel therefore uses chlorine bleach and Quimxel Descol disinfectant. Foggers are also be used.
- Once a room has been cleaned and disinfected, it should be left to rest for a period of not less than twenty-four hours before it can be occupied.
- Dirty laundry from rooms should be treated individually in different plastic bags.

Procedure in case of a room with a potentially infected guest

- All hotel staff who have to enter a room with a potentially infected guest should wear gowns, face masks, gloves and safety goggles, and wash their hands as soon as they leave the room, maintaining a safe distance (2 m) between people at all times. All used PPE is to be immediately discarded.
- The cleaning trolley should never enter the room.
- If bedding needs to be replaced, it should be put inside a closed bag and tagged, and the industrial laundry service should be warned so it can be suitably treated.
- All disposable material used by the guest should be put in an individual closed bag to be removed from the room for subsequent disposal.



- Always use disposable paper for cleaning surfaces.
- Once guests leave their room, it is to be sealed for a period of 72 hours. After this period, a total disinfection is to be carried out, with the disinfectant and virucide products mentioned in the COVID-19 Prevention Measures section.
- Special attention is to be paid to the cleaning and disinfection of toilets and contact surfaces, such as handles, remote controls, telephones, air conditioning controls, switches, hair dryers, etc.

Room and Table Linen

An action protocol is to be agreed with the laundry service:

- A certificate of cleanliness and disinfection is required and should be documented.
- A certificate is to be required for products used in washing processes.
- All dirty laundry should be collected exclusively in plastic bags in trolleys and, at the end of the day, placed in the laundry cages. It can never be placed on other items or surfaces.
- Both towelling and flat fabrics must be properly identified.
- When clean clothes are delivered, they must be properly identified and packaged. Any delivery that is not properly packed and labelled should be rejected.
- Linen that is torn or in poor condition should be subjected to the same procedure. Linen should always be in its storage space in service rooms or in a trolley; never on the floor or on any other surface.
- The use of face masks and gloves by the staff is mandatory for handling linen, particularly dirty linen.
- Rooms cannot be entered without proper protection, mask and gloves.





Common Areas, Toilets

All common areas require **social distancing of two metres** and maximum capacity should be posted outside toilets.

Measures in these areas.

- All towelling is to be removed from toilets.
- Cellulose should be used exclusively.
- There should be only one pedal-operated waste bin in common toilets, with the exception of the sanitary bins.
- Toilets are to be cleaned at least six times a day, and each cleaning recorded (Annex 7.1).
- Suitable ventilation should take place once a day, preferably at night and also recorded (Annex 7.1).
- Toilets and other common areas are to be provided with relevant signage with recommendations to that effect.

Particular emphasis should be placed on the cleaning and disinfection of the following items:

- Botonaduras.
- Button panels.
- Counters.
- Handles.
- Railings.
- Supports.
- Hangers.
- Tables.
- Bedside tables.
- Vanity units.
- Staircase handrails.
- Magnetic keys for staff use.
- Trays.
- Telephones.
- Bathroom fittings.
- Controls and switches of all types.





Common Areas, Lifts

The following guidelines are defined for these:

- Their use is to be limited both in the main lifts and in the service lifts to only one person, unless they are members of the same family unit, and face masks are to be worn at all times.
- They shall be disinfected at least six times a day. This process should be recorded (Annex 7.1).
- Lifts should display the necessary information inside and outside.
- Railings, wall plates, mirrors, etc. should not be touched.
- Security measures are to be maintained at all times when entering the lifts.

Common areas, lounges

Before and after lounges are used by guests, they are to be cleaned and disinfected as per the specifications of the new cleaning manual drafted by Hotel Management (Annex 7).

Maximum Capacity Common Areas and Lounges

There is a maximum limit of **50% of allowed capacity** in Common areas and lounges, and under no circumstances may the limit of **30** people be exceeded.

Ventilation/Air renewal

In view of the importance of good ventilation in the prevention of COVID-19 infection, we have improved the mechanical ventilation of the hotel's lounges and common areas that cannot be manually ventilated.

This ventilation-renewal with fresh air is carried out in the lounges by means of air extraction-impulsion equipment in less than four minutes. It is also complemented with natural ventilation.

In addition, the hotel uses CO2 meters to monitor air quality and renewal.

Lounge ventilation and air-conditioning is to be started up thirty minutes before occupation. Once a lounge is vacated, the equipment is to be kept in operation for thirty minutes. Subsequently, the room should be cleaned and disinfected with foggers and COVID-19 virucides.

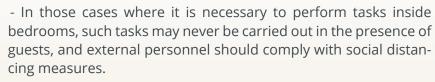


Maintenance

In this Department, in addition to existing indications specified in our quality system, the following actions should be carried out:

Staff should be trained in the use of PPE and this should be recorded (Annex 5).

- All actions that require external service must comply with the following specifications:
 - The hotel should be exclusively entered through the garage, with prior knowledge and consent from Hotel Management.
 - No vehicles are allowed inside the hotel garage.
- Employees are not to be allowed to access the hotel car park with their vehicles.
- Vehicles from other companies are not allowed to enter the premises unless strictly necessary, in which case the vehicle number plate, company, passengers and materials are to be recorded. (Annex 9)
- All external personnel accessing our facilities must have the appropriate PPE to carry out their work, this being the responsibility of the contractor. A safe distance of two metres should be maintained.
- When entering our facilities, the name of the company, personnel and the PPE they are wearing to carry out their tasks should be recorded (Annex 10).



- A record should be kept (annexes 9 and 10) when external employees enter and exit the premises, indicating their full name, the company name and reason for the visit, together with the date.
- This document should be filed daily at reception.
- In the case of technical visits by public administration personnel, the same measures (Annex 11) shall apply, both regarding control and means of protection.
- Their visit should be recorded (annexes 9 and 10) in the same way as for maintenance personnel coming to carry out tasks within our facilities.





- Under no circumstances will the hotel provide PPE to external personnel.
- The movement of such personnel within the hotel premises shall be controlled by the hotel.
- Repairs in rooms with guests who are potentially ill and who remain inside the room.
 - Both internal and external personnel must be protected with suitable masks, safety goggles, gloves and aprons or gowns, which are to be disposed of when they exit the room, and they should subsequently clean and disinfect their hands.
 - For the duration of this work, guests present in the room must keep their masks on and social distancing (2 m) must be maintained at all times.
- Checking of disinfection equipment.
 - The operation of soap, hand sanitiser, paper towel, and other dispensers should be checked at least once a day, and any defective equipment should be repaired or replaced.
 - Toilets and taps located in common areas should also be checked.





Suppliers

In addition to existing indications specified in our quality manual, the following guidelines should be strictly followed:

- Access to the hotel to be exclusively through the garage.
- No vehicles are allowed inside the hotel garage.
- A mask should be worn and a safe distance distance (2 m) maintained.
- Goods should be left at the designated reception point.
- The name of the company, the person and the PPE they wear are to be recorded.





Waste Treatment

In addition to existing indications specified in our quality manual, the following guidelines should be strictly followed:

- All waste from each floor should be concentrated in one place.
- All waste collection bags must be properly closed and placed in the waste bins at the end of the working day.
- Waste cleaning products with special disposal requirements should be collected in a separate bag.
- All handling must be done exclusively with protective gloves (nitrile type).
- When a service concludes, particularly on floors/cleaning department, no waste may be left in trolleys or carts.
- Trolleys and carts are to be disinfected at the end of service and before starting a new one.
- A single person is to be in charge of their collection and transport, and this person should be properly protected with the necessary PPE.
- All bags in each department must be left properly closed.
- At the end of each day, no uncollected bag should remain anywhere in the hotel.

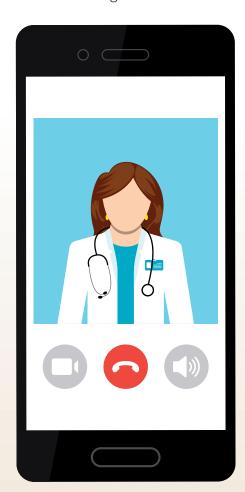




Protocol in case of

possible infection by COVID-19 (Guest or Employee)

When any type of infection can be detected or foreseen, both guests and employees are to follow these guidelines:



Osakidetza Health Board 900 203 050

- The regional health authorities should be immediately notified by calling the Osakidetza Health Board 900 203 050.
- The potentially infected person should be immediately isolated until the health authorities indicate the best course of action.
 - Potentially infected individuals should be kept completely isolated from the rest of guests and staff; if they are lodged, in their room, and, if they are not lodged, confined in a room. We will have to wait for Health Department protocols before attending to them or carrying out maintenance. If it is necessary for this person to remain within the facilities, this will be under the orders of the health authority.
 - Avoid contact with or closeness to other people.
 - Keep mask, safety goggles and nitrile gloves on at all times.
- As a preventive measure, the actions of the potentially infected person over their last hours in the hotel should be traced, noting down possible contacts, areas where they circulated, etc.
- Should the person turn out to be a positive case, once they have been evacuated, any areas where they may have been should be thoroughly disinfected, both inside and outside. The room should be sealed off for a period of 72 hours.



- In the case of guests, the room should be thoroughly disinfected.
- In the case of employees, and as a preventive measure, changing rooms should be closed off until they are completely disinfected.
- In the case of infection of Hotel employees, there are three possible scenarios::
- 1 Symptoms of infection are felt at home: The employee's immediate superior at the Hotel and the Community Care Centre, **Osakidetza Health Board (900 20 30 50)** are to be notified immediately .
- 2 When arriving at the Hotel, if the body temperature taken at the Reception checkpoint is equal to or higher than 37.5 °C, the employee must leave immediately and go home, following the above indications.
- 3 In the event that the symptoms of infection are felt while working at the Hotel, the employee's immediate superior should be notified right away. Immediate confinement is to be applied and the Community Care Centre, **Osakidetza Health Board (900 20 30 50)** notified. All areas where the employee has been working and all staff members with whom the employee has had any contact are to be traced and instructions from health authorities followed.
- 4 In the event that the Public Health Service (Osakidetza) confirms that the employee has tested positive for COVID-19, and in cases when the employee feels symptoms associated with the disease, the Hotel Safety Committee should notify the Health Surveillance department of the Occupational Health and Safety Risk Management Service (IMQ / 946 56 66 00) about the affected employee and those with whom he/she has been in close contact.
- 5 Even if the health authorities do not specifically advise it, for greater safety, the Hotel is to carry out PCR tests on all employees who have been in direct contact with the affected employee for more than 15 minutes at a distance of less than 3 metres.



Signage

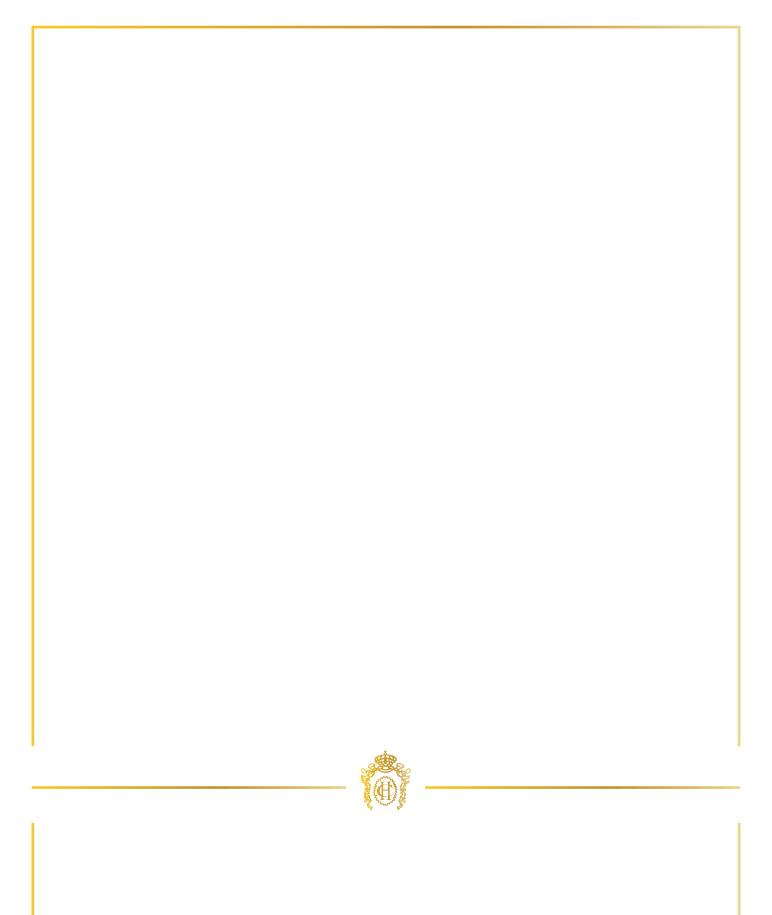
Signs are to be installed indicating preventive measures to be complied with. (ANNEX 2) The Hotel has the signs indicated in each department to inform its guests.

- Entrance area at reception.
- Common areas and toilets.
- Lifts.
- Floors.
- · Rooms.
- Breakfast areas.
- Gym.
- Business Centre.
- Lounges.





Annexes





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