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THE NEWSGUILD OF NEW YOR[Date] 31003, CWA

[Name of recipient]
[Address of recipient]

Re: Information Request – COVID-19 Health and Safety

Dear [Name]:

For purposes of bargaining and representation, the Guild hereby requests the following information with respect to the office reopening scheduled for [Date], and the steps that the Company has taken or plans to take to keep employees safe from COVID-19. We are seeking this information to determine whether the Company is abiding by statutory health and safety obligations as well as to determine whether the Company is engaging in a unilateral change in working conditions. Please acknowledge receiving this request.

Please provide the following:

1) How did the Company arrive at the [date] date for returning? Please include any emails, memoranda, reports, texts, correspondence or other written materials -- whether hard copy or electronic -- on this subject among [Company] executives and newsroom managers.

2) An explanation of why the Company is moving to a mandatory return of Guild members to the newsroom. Please include any emails, memoranda, reports, texts, correspondence or other written materials -- whether hard copy or electronic -- on this subject among [Company] executives and newsroom managers.

3) What medical experts, public health officials, healthy office environment experts or others has the Company consulted or received information from about how to safely have employees return to office locations? Please provide the names, titles and positions and agencies/organizations of all such experts and officials, any written guidance they provided and what steps, if any, the Company has taken to follow their recommendations.

4) What specific health and safety measures are currently in place to prevent infection with SARS-CoV-2 (the virus that causes COVID-19) while at work? Please provide copies of all protocols and policies.

5) [If employer is in New York State] New York State law requires every employer to establish an airborne infectious disease exposure prevention plan that meets or exceeds

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the minimum standards established by the Commissioner of Health and Department of Health. Please provide copies of this plan, including any emails, memoranda, reports, texts, correspondence or other written materials -- whether hard copy or electronic -- on this subject among [Company] executives and newsroom managers. New York State law also requires the Company's exposure plan to be provided to each employee. Please provide a timeline of when this plan was created, implemented, and subsequently communicated to all employees in keeping with New York State law. Please provide a list of all supervisory employees responsible for enforcing compliance with this plan, as required under New York State law, and all training they have received, including name(s) of the person(s) presenting the training(s); the length of each training program; and copies of any and all materials used and/or presented in the training including hand-outs, powerpoint-type slide presentations, agendas and related materials. Please provide a listing of every location where this plan is currently publicly posted, as required by New York State law.

6) Have safety teams received training on COVID-19 and the protocols currently in place? If so, please provide the date(s) of this training; a copy of attendance lists; the name(s) of the person(s) presenting the training(s); the length of each training program; and copies of any and all materials used and/or presented in the training including hand-outs, powerpoint-type slide presentations, agendas and related materials. If training has not yet been provided to safety teams, please provide a schedule for when such training will be presented, as well as information about who will present the training, how long training will be, the content of such training and copies of any and all materials to be presented.

7) A copy of the training bargaining unit employees must take prior to the reopening, including a copy of any and all training materials.

8) Please identify and describe the type of HVAC system that is currently in place, including whether it reaches all areas in the building, or if there are some places not served by this HVAC system. Does the system provide fresh air? How much fresh air is provided? Can it be increased? Does the system currently have MERV 13 or higher filters installed? If so, when were they installed and by whom? When was the last time the system was inspected and/or maintained? Please provide all inspection and maintenance records since January 1, 2020, including but not limited to when filters were installed and/or changed. Have there been any physical changes made in the building's air handling and filtration systems since the start of the pandemic? If changes were made, what was changed and when and why were these changes made? What hours does the HVAC system operate now, and is there any time it is shut off during the day or night? Will this schedule be changed once the building is occupied? If so, what changes will be made? Have HVAC experts and/or industrial hygienists checked all areas inside the building, including the newsroom, with a balometer to ascertain the number of air changes per hour in each room where people are or will be located? If so, please provide any and all reports and documents from these visits and checks. If air changes per hour have not yet been checked, is there a plan to do so? Please provide information about any such plans including who will be doing these checks, the protocols they will be using and the timing of this work. Is there a functioning exhaust system in all restrooms? When was the last

time the exhaust systems in all restrooms were checked? Please provide all documents resulting from these most recent checks. What health and safety experts have reviewed and signed off on the adequacy of ventilation and filtration systems certifying them as being sufficient to remove or eliminate viruses including SARS-CoV-2? What is the current schedule to check and maintain the HVAC system including filters? What is the current schedule for upcoming filter changes? What pandemic and post-pandemic best practices for ventilation and filtration has the Company reviewed or consulted? Please provide copies of the materials (hard copy and/or electronic) included in this review. What type of information-sharing on a regular basis will occur with the Guild regarding upcoming and on-going ventilation and filtration checks, filter changes and any other changes to the ventilation/filtration system? If there are areas in the building not served by an HVAC system fitted with a MERV 13 or higher filter, have portable air cleaners with HEPA filters been purchased and supplied to those rooms and areas? If so, please provide information about the types and locations of all portable air cleaners with HEPA filters including when they were installed. If there are areas not reached by the HVAC system and air cleaners with HEPA filters have not yet been purchased or installed, is there a plan to do so? Please provide a copy of such a plan if there is one.

9) Please provide copies of any reports or studies done regarding the building's air circulation system and if or how air flows between offices, sections and floors of the office buildings, and how that impacts air that will be shared between and among those areas.

10) Will there be a limit on the number of people allowed in the newsroom? If so, what is that limit? How was this limit determined? How will the limit be enforced, and who will enforce it? Who will be responsible for monitoring the limit and with what frequency? If there is no limit on the number of people allowed in the newsroom at one time, what information was reviewed and what occupational health, medical, public health or other experts were consulted to arrive at the decision not to limit the number of persons in the newsroom?

11) Will employees in common areas, including the open newsroom, be required to wear masks? If so, will masks be provided? What type of mask(s)? How often will employees be provided with new masks? Who will enforce this mask requirement? What if an employee declines to wear a mask?

12) Will seating assignments in the newsroom be changed to provide more distance between those working? If so, what will the new seating assignments be? Who will be involved in planning the seating chart? What accommodations will the Company make for people who a) are not vaccinated; b) have regular contact with immunocompromised individuals; c) are immunocompromised themselves or have health conditions that could make them particularly susceptible to a COVID-19 infection? What does the Company consider to be proper and protective social distancing requirements, and on what research is that understanding based?

13) Will access to vaccines be provided to employees (or facilitated), with time off for any symptoms? Will employees be required to be vaccinated and have to prove their vaccination status? If so, what if an employee objects to disclosing vaccination status? What if someone isn't vaccinated? What if someone has an objection to getting a vaccination or is unable to do so for medical or religious reasons? What accommodations will the Company provide to protect workers who are not vaccinated or those who are otherwise at risk including immunocompromised workers who may be vaccinated but for whom the vaccination may not offer as much protection? What are the Company's requirements of managers on this issue? What are the Company's requirements of its unionized and non-unionized staff on this issue? Are there internal written protocols at the Company regarding vaccines and vaccination status? If so, please provide them.

14) If you are considering a vaccine mandate, will you be additionally mandating boosters? Given that the CDC has now recommended boosters for all adults, does the company plan to track the timeline for booster shots for various employees? If the company is not planning to mandate booster shots, then what plans is it putting in place for a potential rise in transmission, hospitalization, and even deaths resulting from the combined Delta variant, Omicron variant, and vaccine waning?

15) Will all employees, including management employees, be required to take COVID-19 tests? If so, what test or tests will be used? How often will employees be tested? Who will pay for the tests and the laboratory costs for reading the tests? What criteria will be used for determining who must take them? If COVID-19 tests are not to be required, will tests be made available for employees who want to have a COVID test regularly or periodically? If so, what test or tests will be provided? Will the Company pay for the tests and the laboratory analyses?

16) How often are the offices being cleaned? What guidelines have been provided to cleaners? What if any company is being contracted to clean the office? What training have they received regarding COVID-19? What specific cleaning chemicals are being used (or will be used)? Please provide the Safety Data Sheets for all cleaning chemicals. Will employees be notified when those workers will be doing a general office cleaning so they can avoid the office during that time? How will the Company know and verify if the cleaning staff is vaccinated? How will the Company know if any of the cleaning staff tests positive for COVID-19? If that occurs, what steps will be taken? What information about the cleaners' health status regarding SARS-CoV-2 will be provided to the Guild?

17) What happens if someone regularly in the newsroom tests positive? Are there written protocols for how the Company will handle that situation? If so, please provide them.

18) Please provide any correspondence between management and/or [Company] executives regarding a potential hybrid work model (splitting time between working from home and the office).

19) Will the bargaining unit members be notified if a non-[Company]worker or patron on other floors of the building(s) tests positive for COVID-19? What will the procedure be in that case? Please provide a copy of any and all protocols for this situation.

20) What precautionary measures are being, or will be, taken for the lobby, elevators, stairs and areas outside of the newsroom to protect employees and prevent the transmission of SARS-CoV-2 in those areas? Please provide any and all protocols for these areas.

21) What are the Company's current record keeping, reporting to health departments and contact tracing protocols? Please provide them in writing.

22) Is there a symptom or exposure reporting protocol or process in place? If so, please provide a copy of the reporting protocol or process.

23) What would the Company consider an "outbreak" – how many employees would need to become infected to be considered an outbreak? What are the Company's protocols in the event of an outbreak? Please provide written copies of any and all such protocols.

24) The CDC has issued guidance that the Delta variant is substantially more contagious than the original COVID-19 virus, producing up to a thousand times more virus particles in the noses and throats of infected persons, and that emerging evidence has found that the level of virus in infected vaccinated people is "indistinguishable" from the level of virus in the noses and throats of unvaccinated people. How is the company's return to office plan taking the significant occupational safety and health hazard posed by the Delta variant to everyone—vaccinated and unvaccinated persons alike—into account? Please include any emails, memoranda, reports, texts, correspondence, or other written materials —whether hard copy or electronic—on this subject among [company] executives and newsroom managers as well as the names, titles, and positions of medical experts, public health officials, healthy office environment experts and agencies/organizations that have been consulted on the new emerging threat from the Delta variant as well as any written guidance they provided and what steps, if any, the Company has taken to follow their recommendations.

In all instances, the Guild's preference is for documents in electronic form via email attachment, which we are confident will allow the speediest compilation and transmission of the requested information at the least inconvenience and cost to the employer. The Guild requests that information be returned to [email]. Please provide the requested information at your earliest convenience, but no later than one week from receipt of this request.

If any part of this request is denied, or if any material has not been fully assembled by the requested date or is otherwise unavailable, please provide the remaining items by the requested date, which the

Guild will accept without prejudice to its position that it is entitled to all documents and information called for in the request.

This request is made without prejudice to the Guild's right to file subsequent requests.

Thank you for your prompt attention and assistance in this matter.

Yours truly,

[Name]

cc:

[Unit leader names and emails]