



ECHO MOUNTAIN INN

Echo Mountain Inn

COVID-19 Policy and Health

Vivienne Mackenzie

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COVID-19 POLICY AND PROTOCOLS PLEDGE

I, Vivienne Mackenzie, Director of Starplex 267 CC T/A Echo Mountain Inn, hereby undertake to implement the following measures, giving effect to the requirements set out in the Directive issued by the Government:

- Appoint responsible persons for the implementation of administrative measures, including the identification of exposure risks, development of return to work plans, implementing control measures, and the communication and reporting thereof.
- Implement physical distancing requirements such as revised working arrangements, queuing, and supervision to minimise contact between employees, outsourced workers, and guests (our people), and install barriers or provide face shields where physical distancing is not achievable.
- Implement strict access control measures including screening our people for symptoms or risk of exposure and manage any suspected or confirmed COVID-19 cases following guidance by the Department of Health and Department of Employment and Labour.
- Provide handwashing facilities and sanitisers throughout our facilities for our people to use.
- Provide our employees with cloth masks and personal protective equipment (PPE) free of charge.
- Increase the frequency of cleaning and disinfection of all areas, especially frequently touched objects and surfaces.
 - Improve awareness on COVID-19 for our people and implement employee training programmes to ensure that our protocols are implemented effectively.
- Notify our employees of the contents of the Directive and our COVID-19 Policy and Health plan, which sets out how we intend to implement it. Furthermore, I pledge that we will adhere to the Travel and Tourism Industry Standard Protocols for COVID-19 Operations issued by the Tourism Business Council of South Africa, and updated from time to time, in our operations, premises and vehicles, and at all operating times. We will continue to comply with all Directives, regulations and sectoral guidelines that may be published about COVID-19, cooperate with any inspections, and adhere to the tourism Protocols until they are receded or replaced by alternative health and safety operating Protocols. In addition, we will endeavour to support and assist emerging, small, and micro-enterprises that we procure from, as our services are integral to theirs, to adhere to these COVID-19 Protocols. We do this in recognition of our critical role to provide safe transport, accommodation, gaming, entertainment, activities, and experiences in our units during and after the COVID-19 pandemic. We commit to these Protocols because we understand and acknowledge that we carry a joint responsibility to protect our people from COVID-19, in particular, vulnerable individuals. By committing to these protocols, we also support the leaders of our country to minimise the spread of COVID-19, and to further the wellbeing of South Africans.

Vivienne Mackenzie

Director

Vivienne Claire Mackenzie

PURPOSE

As a responsible employer and corporate citizen, our duty is to provide a safe and healthy working and operating environment for our employees, outsourced workers, and guests (“our people”) at our properties. As a result, Echo Mountain Inn has developed comprehensive health and safety Protocols for its business unit that make provision for the collection and protection of personal information, measures to ensure physical distancing, sanitisation and hygiene practices for our people and facilities, provisions for personal protective equipment (PPE) where required, contingencies for the protection of vulnerable individuals, and measures to deal with a potential COVID-19 incident on-site, including contact tracing. We have documented and recorded these Protocols in a consolidated Policy and Plan and have informed our people of these measures in preparation for return to work. Our Protocols align with the World Health Organization (WHO), National Institute for Communicable Diseases (NICD), Department of Health (DOH), Department of Employment and Labour (DEL), and National Department of Tourism (NDT) Directives, guidelines, and advice. We are also committed to complying with all industry and sector-related Protocols. We are closely monitoring these institutions for policy changes, revised guidelines, and Government Directives and will continue to make changes as necessary to our Protocols.

APPLICATION AND LOCKDOWN REGULATIONS

The policy applies to our people, as defined in this document. Furthermore, the nature and extent of regulations in respect of the obligations of Echo Mountain Inn to comply with COVID-19 regulations will be a direct result of the regulations issued under the Disaster Management Act and other relevant statutes, from time to time. This policy remains in force as long as the declaration of a National Disaster, published in Government Gazette number 43096 of 15 March 2020, remains in force.

REFERENCES

Our preventative measures and protocols are guided by the following legislation, regulations, and guidance documents. This list is not exhaustive and will be updated as new information becomes available.

- Disaster Management Act, 2002: Classification of a National Disaster
- Disaster Management Act 2002: Declaration of a National Disaster
- Disaster Management Regulations: Alert Level 4 as at 30 April 2020
- Disaster Management Regulations: Determination of Alert Levels and Hotspots as at May 2020
- Occupational Health and Safety Act (OHSA), 85 of 1993, as amended
- Hazardous Biological Agents Regulations, 2001
- Facilities Regulations, 2004
- Basic Conditions of Employment Act (BCEA), 75 of 1997
- Protection of Personal Information Act, 4 of 2013
- Department of Employment and Labour Workplace Preparedness: COVID-19 (SARS-CoV-19 Virus) guidelines, issued on 22 March 2020
- Consolidated COVID-19 Direction on Health and Safety in the Workplace, Directive issued on 4 June 2020

- COIDA Notice: Claims for COVID19 infections at the workplace as at 23 March 2020
- Public Transport Directions as of 4 May 2020
- DTIC: Recommended Guidelines for Fabric Masks
- World Health Organisation: Getting your Workplace Ready for COVID19 (19 March 2020)
- Department of Health: COVID19 Environmental Health Guidelines (16 March 2020)
- Department of Health: Rational Use of PPE Guidelines (26 April 2020)
- Guidance on vulnerable employees and workplace accommodation relating to COVID-19 (Version 4: 25 May 2020)
- Guidance note for workplaces in the event of identification of a COVID-19 positive employee (Version 5: 14 May 2020)
- Clinical management of suspected or confirmed COVID-19 disease (Version 4: 18 May 2020)
- Guidelines for symptom monitoring and management of essential workers for COVID-19 related infection
- Guidelines for quarantine and isolation relating to COVID-19 exposure and infection
- Sun International COVID-19 Health and Safety Policy

DEFINITIONS

The following definitions are provided for consistency and clarity of the terminology used in this document. Directive The consolidated Directive issued by the Minister of Employment and Labour in terms of Regulation 4(1) of the Regulations R480 of 29 April 2020 issued by the Minister of Co-Operative Governance and Traditional Affairs in terms of Section 27(2) of the Disaster Management Act.

COVID-19 Coronavirus disease 2019 (COVID-19) is a disease caused by the SARS-Cov-2 virus.

The primary symptoms include:

- A fever, which is a temperature above 37.3 degrees
- Coughing
- Difficulty breathing/shortness of breath
- Sore throat
- Chills
- Body aches, including headaches
- Loss of taste/smell
- Nausea, diarrhoea, and vomiting, or all
- Individuals who contract COVID-19 may take anywhere from one to 14 days to develop symptoms

Virus This refers to COVID-19

Employee Anyone within the direct employ of Echo Mountain Inn

Guest Includes all day visitors and Hotel visitors

Our people Includes all employees, outsourced workers and guests at any of our business units

Outsourced Workers Includes all workers employed by Contractors, Service Providers, and Concessionaires to perform work for Echo Mountain Inn, and are not in the direct employ of Echo Mountain Inn

Physical Distancing Physical distancing (also referred to as Social Distancing) is a measure taken to prevent the spread of a contagious disease by maintaining a physical distance between people and reducing the number of times people come into close contact with each other.

The current requirement is for people to maintain a distance of at least 1.5 meters from each other.

Vulnerable individuals Are people that have a higher risk of developing severe illness due to COVID-19, and include:

- People 60 years and older
- People of all ages with underlying medical conditions, particularly when not well controlled, including:
 - o Chronic lung disease or moderate to severe asthma
 - o Serious heart conditions
 - o Hypertension (high blood pressure)
 - o Severe obesity (body mass index [BMI] of 40 or higher)
 - o Diabetes
 - o Chronic kidney disease
 - o Liver disease
 - o Immunocompromised, including cancer treatment, smoking, bone marrow or organ transplantation, immune deficiencies, poorly controlled HIV or AIDS, prolonged use of corticosteroids and other immune-weakening medications

COVID-19 COMPLIANCE OFFICERS AND RISK COMMITTEE

Our business units have appointed a COVID-19 Compliance Officer (COVID-19 Officer) and instituted a COVID-19 Risk Committee that comprises of key department heads.

This cross- functional team will report to the COVID-19 Officer and General Manager on the implementation of COVID-19 Protocols and any issues related thereto.

The COVID-19 Officer and Risk Committee are responsible for:

- Implementing this policy
- Engaging with on-site Safety, Health and Environment (SHE) Committees and the General Manager on all matters pertaining to COVID-19
- Conducting risk assessments and identifying the relevant control measures required to effectively eliminate or control identified hazards, as required by the Directive
- Developing, implementing and communicating return-to-work plans to employees
- Discussing the risk assessments and return-to-work plans with the representative trade union and SHE Committee
- Submitting the necessary documents as prescribed by the regulations to the Department of Health and Department of Employment and Labour as required
- Monitoring our people's adherence to the control measures, standards, and health and safety Protocols as outlined in the return-to-work plans
- Managing and reporting COVID-19 incidents and material risks.

SUSPECTED COVID-19 CASES

We have developed unit-specific incident management Protocols, which outline the steps to be taken when there is a suspected COVID-19 case on site. Where a person is suspected of having symptoms or risk of exposure to COVID-19, the incident management Protocols will be initiated. Our protocols include contacting trained individuals, equipped with the necessary PPE, to assist with isolating the individual, notifying the relevant authorities, assisting them to be transported to a testing facility for further assistance, and arranging for the areas they were in contact with to be decontaminated thereafter. The property will investigate how a COVID-19 case presented on-site, and whether any controls need to be introduced, strengthened, or changed. While our priority is to protect the health and safety of our people, we need to run a sustainable business. Therefore, the decision to – or not to – close part of the business, deep clean and arrange for individuals to be sent home, or all, will be based on the facts available at the time. Where an employee tests positive for COVID-19, all employees on that member’s shift team will be required to self-quarantine for 14 days. Alternative accommodation may be provided to employees who are not able to self-quarantine at their place of residence. If testing becomes widely and easily available, all impacted employees will be tested. COVID-19-free employees or employees who have quarantined for 14 days can return to work.

ACCESS CONTROL

Points of entry to our property will be limited to ensure that access is controlled. Additional entry requirements have also been implemented to ensure that sick individuals, and those that do not comply with physical distancing and hygiene requirements, are prohibited from entering. The following requirements must be fulfilled by our people to be allowed entry:

- At all primary entrances, bollards and tape or rope will be erected, and floor markings laid down to establish queue routes and ensure a distance of 1.5 meters is maintained between people.
- Access to the property is strictly for persons 18 years and older
- Access to our Casino gaming floor is limited to persons with ID in presence and passing the general screening
- Every individual must wear a cloth or disposable mask at all times throughout the property.
- Individuals must also accept our COVID-19 Entry to Premises Terms and Conditions¹.
- Before entering, individuals will be required to undergo a non-invasive temperature check and complete a medical screening questionnaire to assess their risk.

Recorded details will be retained for contact tracing purposes, should it be required.

- Anyone displaying a temperature over 37.3°C, or presents with flu-like symptoms, or has indicated a high risk of exposure to the virus, will be taken to an isolation area for a secondary assessment and, if applicable, assisted in getting necessary medical care.
- Our employees have the option of doing a self-assessment screening at their homes. Should they identify any symptoms, they will be required to remain at home, contact their healthcare provider to obtain medical assistance and will be placed on paid sick leave in terms of Section 22

of the Basic Conditions of Employment Act (BCEA). If they do not present with a temperature or symptoms, they can display evidence of conducting the self-assessment at the entrance, bypassing the medical screening questionnaire.

For multiple-day Hotel stays, temperature recordings will be done when departing and arriving at the Hotel each day. Our COVID-19 Entry to Premises Terms and Conditions are provided as Annexure A to this document.

HYGIENE REQUIREMENTS

Hand hygiene and cleaning remain our key defence against COVID-19; therefore, strict hygiene Protocols have been implemented in our business units.

SURFACE CLEANING AND DISINFECTION

Our property will be deep cleaned at least two days before reopening. Our business units and service providers use cleaning products and Protocols that meet United States Environmental Protection Agency (EPA) guidelines, are approved for use and are effective against viruses, bacteria, and other airborne and blood-borne pathogens. We are working closely with our suppliers and service providers to ensure an uninterrupted supply of these cleaning supplies and the necessary personal protective equipment (PPE). Areas that are used continuously, such as counters or desks, will be disinfected as often as practically possible. These surfaces will also be thoroughly cleaned daily. All other surface areas will be cleaned and disinfected as per a defined cleaning schedule, which takes into account how frequently the surface is used, what it is used for, and the surface type. Cleaning and disinfection records are kept to monitor compliance. In addition, the following frequently touched objects and surfaces throughout our properties and in/on vehicles, will be disinfected between uses where practical, or at scheduled intervals as defined by a cleaning schedule:

- Water bottles, jugs, and amenity bottles
- Door handles in rooms/vehicles/cupboards
- Key cards
- Pens used by more than one person
- Credit card machines, especially the keypad buttons
- Light switches
- Taps and mixers
- Soap and sanitiser dispensers
- Toilet roll holders
- Toilet flush buttons/levers
- Toilet seats and surrounding cubicle walls
- Plug switches
- Salt & Pepper shakers, and other static tableware
- Tablets and mobile devices
- Computers and laptops
- Printers and communal equipment
- Ice machines
- Waitron stations
- Vending machines
- Deck railings and bannisters/balustrades
- Dining surfaces and seating areas

- Public food-service utensils or receptacles/ dispensers, handles, taps, buttons, etc
- All counters and desks
- Plastic folders
- Kitchen surfaces
- Fridge handles and doors
- Kitchen equipment
- ATMs
- Vehicle keys
- Steering wheels and gear levers
- Dashboard controls
- Armrests and the backs of seats/chairs
- Seatbelt buckles
- Window levers/buttons
- Air-conditioning controls and vents
- Window sills
- Slots equipment and machines
- Gym equipment
- Biometric scanners and clock-in machines
- Lockers

HAND HYGIENE

Our people are required to sanitise their hands upon arrival at our entrances, check-in counters, and before entering our vehicles. Our employees or security personnel will administer the sanitiser, or it can be self-administered from a dispenser. Only 70% alcohol-based hand sanitisers are used at our property. Surface sanitisers and wipes, or both, will be available for our people to wipe down frequently touched objects such as pens, credit cards, phones, wallets, purses, etc. when used. Hand sanitiser dispensers – touchless, whenever possible – are also located throughout our property at high-traffic areas such as entrances/exits, lobbies, toilets, reception areas, gaming floors, cash desks, restaurants and bars, meeting and conference venues, biometric devices, and in back-of-house areas. Hand sanitiser will also be provided in Hotel rooms. Hand soap or hand sanitiser is available in all bathrooms and change rooms. Where practical, appropriate non-touch bins are also available for waste disposal. Where this is not practical, hand sanitiser dispensers are provided. Our employees are required to wash or sanitise their hands before, and immediately after, entering the work premises or vehicles, after changing into uniforms and using lockers, after using the restrooms, sneezing, touching their face, blowing their nose, cleaning, sweeping, mopping, smoking, eating, drinking, entering and leaving the gaming floor, and going on break. Where practical, porters, security, or other employees will be available to open doors, press lift buttons, etc., at access areas to limit the touching of surfaces. Alternatively, where practical and does not constitute a fire or security risk, doors may be left open to reduce surface touching.

CASINO (VSLOTS)

Hand sanitiser will be made available throughout the gaming floor, for guests to use. Our employees are required to sanitise their hands before starting their shift and between guest interactions. All equipment and furniture will be cleaned on a scheduled basis or between games. Sanitiser will be available for guests to clean their own machines should they wish to do

so. Where practical, physical barriers will be installed between slot machines. Employees will be walking around with sanitiser should a guest wish to sanitise their machine before commencing play.

All frequently touched objects or areas such as cash IOs, promo kiosks, and welcome desks will be sanitised after each guest interaction. All cash desks, card machines, and devices will be sanitised after each guest interaction. Employees are also required to sanitise their hands frequently, especially after handling cash.

HOTEL

Walk-off mats that prevent excess dirt and grime build-up underneath shoes, which could release harmful particles into the air, will be available at all entrances. Where possible, our employees will not handle a guest's luggage. However, if a guest needs assistance, our porters will follow physical distancing measures, and the handles and corners of the luggage will be wiped with a surface disinfectant. Porters will also sanitise or wash their hands immediately before and after touching luggage. At check-in/out counters, the use of pens will be avoided where possible. Where this cannot be avoided, pens will be sanitised between each use. Where practical, physical barriers will be installed at these counters; alternatively, our Hotel receptionists will wear face shields. When cleaning an occupied room, all surfaces, including phones, TV, air-conditioner and radio remote controls, kettles, curtain pulls, curtain edges, minibars, trays, amenity containers, and bottles, etc., will be disinfected. Where possible, glasses, cups and teaspoons will be replaced with disposables or clean ones. Soiled linen and towels from room changes will be removed with care and gently folded to minimise shaking / dust release before being placed in quality plastic bags to be transported to the laundry or for laundry collection. Upon check-out, all furniture, surfaces, movable items, wall surfaces close to high-traffic, seating and lying areas, bathrooms, and all floors, will be thoroughly cleaned and disinfected. Occupancy permitting, rooms will be left unoccupied for a day or more, to further assist in ensuring that rooms are decontaminated before the next check-in. Where required, additional sanitising such as room fogging or electrostatic sanitising may take place, and rooms will be sealed with a door hanger stating that they have been sanitised. This will also apply to meeting and conferencing venues. All housekeeping trolleys and remaining contents will be wiped and deep cleaned at the end of each day's shift. All other equipment, including mops, wet cloths, etc. will be disinfected by dipping them in a disinfectant solution after each room clean. Colour-coded cloths will be used for different items, including the bath, shower, and sink, toilet, room surfaces, etc. and disinfected separately. At the end of each shift, cloths and mops will be soaked in a disinfectant solution for 30 minutes. Cloths will be washed on a high-heat cycle.

IN-HOUSE LAUNDRY

Before entering the laundry, all laundry attendants must wash and sanitise their hands. On opening the laundry in the morning, or before any equipment is used, a laundry attendant will sanitise and wipe down all surfaces, including inside and outside the washing machine doors, the door handles, the ironers (avoiding the belts), and tumble dryers. Soiled linen received from Hotel rooms in plastic bags will be opened one bag at a time and sorted into towelling and linen. Bags will only be opened as required to fill the machine. The soiled linen must immediately be placed in the washing machines and washed at the correct setting and temperature. Soiled-linen bins will be washed, sanitised or disposed of while the linen is being washed. Bins used for soiled linen will not be used for clean linen. While the washing process is taking place, the linen attendant will also wash the floor with a disinfectant. When the wash cycle ends, the laundry attendant will remove their PPE and place gloves, masks, disposable apron and shoe covers in a bio-hazards box. Only once all potentially contaminated PPE is removed, and their hands washed and sanitised, and a new mask put on, will the attendant open the machine to remove the clean linen and place it into clean and sanitised laundry bins before it is transferred to the tumble dryer or ironer. Where possible, linen changes will be staggered to ensure they are not all on the same day and to avoid a backlog at the laundry. The washing machine area will be demarcated as a PPE ZONE and all other areas as NON-PPE ZONES. Under no circumstances will the linen attendant be allowed to enter a NON PPE zone with potentially contaminated PPE. The floor will also be marked with tape to identify where the PPE zone/dirty-linen zone and the clean linen/reduced PPE zones are. Clean linen and towels will then be placed in the clean linen store. After all washing, ironing and folding are completed, the laundry room will be sanitised, working from the far section of the room to the exit door. A bucket of disinfectant and bleach will be placed at the entrance to sanitise mops and cloths at the end of the shift.

OUTSOURCED LAUNDRY

Our outsourced laundries will be required to guarantee that they are compliant in terms of SANS 10146, by way of a letter of confirmation.

KITCHENS

All kitchen equipment will be cleaned and sanitised frequently as per our food safety programme, including surfaces such as handles, knobs, dials, switches and static equipment. Utensils, pots, pans and receptacles will undergo more frequent hot washing. Kitchen equipment, crockery and cutlery will be washed separately, both on deep, high- temperature wash cycles. All food containers and the exterior of any packaged food item not completely used will be sanitised with wipes after each use (before returning to storage after opening and extracting).

GOODS RECEIVING/LOADING BAYS

Deliveries on-site will be kept to a minimum. Where possible, our employees will be required to handle deliveries. Employees manning the loading and off-loading will be required to wash their hands frequently between each delivery and load. All non-perishable goods will be thoroughly disinfected at a station at the loading bay before entering the stores and refrigerators. The entire area and its surfaces will also be cleaned and disinfected at regular intervals. Suppliers will be advised as to how we will accept goods, and how their employees should arrive with necessary PPE.

VEHICLES

Non-essential items will be removed from vehicles to reduce surface areas. Where water bottles are provided, these will be sealed per guest. Vehicles used frequently for short trips will undergo a surface clean between every trip using disinfectant wipes; this will include levers for opening boots, bonnets, petrol tanks, etc. Vehicles used for longer trips will undergo a deeper clean at the end of the day that may include the use of a fumigator/ozonator. Mats and loose items will be removed and cleaned, and all surfaces, inside and outside, will be cleaned with a suitable disinfectant. Surfaces to be cleaned include inside the boot, inside glove compartments and shelves, inside door compartments, all handles including folded handles on spare wheel compartments, inside the spare wheel, tool compartments and, if used, oil and water dipstick handles, and petrol caps, etc.

CASH

Contactless payment options are available to prevent the handling of cash by our people at all facilities. These may include prepayments, EFTs, credit and debit cards, signing to accounts, SnapScan, Zapper or Masterpass, where available. If a guest or employee handles cash, they must immediately sanitise their hands afterwards.

REMOVAL OF NON-ESSENTIAL ACCESSORIES AND SURFACES

Where practical, we have removed non-essential surfaces to limit or reduce touching and the need for surface sanitising. Examples of these include:

- Rugs, carpets, cushions and other decorative items
 - Magazines, newspapers, games, books, flower pots and vases, etc.;
- these items are available upon request and will be sanitised before and after use or if applicable, disposed.
- All non-essential items in office spaces and on desks

CLOSURE OF UNUSED AREAS

Areas not in use have been locked to discourage use and reduce the need for regular surface or deep cleaning. These areas may include meeting rooms, restaurants, public bathrooms, spas, gyms, executive lounges, business centres, changing rooms, Hotel rooms or floors, etc. Some of these areas may be used upon request, and proper hygiene measures will be followed before and after use. Closed-off areas will be appropriately marked with signage.

DECONTAMINATION IN THE EVENT OF A COVID-19 CASE

Should a potential COVID-19 case be identified, areas that the person came into contact with will be isolated. If the patient is a Hotel guest, their room will be removed from service. These areas will only be returned to service if the individual tests negative. In the event of a positive case, the room and isolated areas will be decontaminated by a licensed expert, before being returned to service.

GENERAL

Our business units are equipped with bio-spill kits. Bio-hazard bins will be available throughout our properties for the safe disposal of single-use face masks, gloves, or other potentially contaminated items. Our facilities and equipment are maintained to ensure the safety and hygiene of our people.

These maintenance Protocols include, but are not limited to:

- Heating, ventilation and air-conditioning systems are regularly serviced. The frequency of air filter replacement and HVAC system cleaning has been increased, and fresh air exchange will be maximised.
- Water reticulation systems, fridges, dishwashers, and laundry equipment, are regularly serviced and are operating effectively.
- Laundries operate on hot cycles of 70°C or more with the usual detergents to ensure clean, disinfected items.
- Dishwashers operate at high temperatures of between 50 to 60°C, with the rinse cycle at 80°C.

An independent third party has been appointed as our food safety and hygiene auditor and will be conducting a COVID-19 facilities audit at scheduled intervals after reopening.

The scope of these audits may include:

- Assessing all cleaning standards and Protocols implemented throughout the property
- Taking surface swabs for testing in guest and high-traffic areas
- Providing a rooms audit

The independent hygiene auditor will issue a post-audit Hygiene Compliance Certificate with recommended improvements.

PHYSICAL DISTANCING

While standing in lines or moving around the property, our people will be encouraged to practice physical distancing of 1.5 metres (preferably 2 metres) from other groups of people not travelling with them. Exceptions to this rule are when a physical barrier is present, or where an employee is wearing a face shield. The following physical distancing and capacity limit requirements will be enforced in all our properties:

ALL AREAS

- Clear floor markings and bollards, or both, cordons, tape or rope, will be used to manage queues and ensure physical distancing. Queuing situations will be monitored and adjusted if proven to be inadequate.
- Excess chairs/stools, furniture in lounges, and tables will be removed or combined to reduce and spread seating capacity and enforce physical distancing.

ALL PUBLIC AREAS

- The floor area in square meters will be determined to implement capacity limits, and ensure adequate space is available between people.

CASINO (VSLOTS)

- Overall capacity on our casino floors will be initially limited to between 33 to 50% of gaming positions. These capacities will be reviewed regularly.
- Chairs will be removed and every second slot machine turned off or locked to ensure a 1.5-meter distance between machines.(If applicable)
- Supervisors and managers will ensure that guests do not congregate around slot machines or tables.
- Seats, tables and booths will be reconfigured or removed to allow for appropriate physical distancing.

HOTEL

- Physical-distancing stickers, along with bollards, tape, or both, will be implemented at all check-in desks.
- Where practical, check-in/out counters will be re-arranged to ensure physical distancing between guests and employees.
- Employees will be assigned to every other counter to create physical distancing.
- Peak-period queuing procedures will be implemented when the number of guests exceeds lobby capacity.
- Should a guest receive a package during their stay, it will be placed in a sealed single-use plastic bag.

RESTAURANT AND BAR

- Where possible, reservations will be taken to manage demand and help ensure capacity limits are adhered to in restaurants.
- Hostesses and managers will manage physical distancing at entries, waiting areas and queues.
- Peak-period queuing procedures will be implemented when guests cannot be immediately seated.
- Tables and booths will be spaced to ensure appropriate distancing between each family or travelling party.
- Bar stools will be reduced.
- Line flow will be managed at quick-serve outlets to ensure coffee and food pick-up areas remain appropriately distanced.
- Room service trays/boxes/containers will be left outside the room on the floor, or a tray, after the guest has been alerted to the delivery by knocking or ringing the bell.
- The employee delivering the food will stand at least 1.5 meters from the door until the food delivery has been retrieved by the guest.
- After finishing with their meal, guests will be requested to leave the tray with the used items and waste in the bag provided outside the room.

CONFERENCING AND MEETINGS

- Seating will be arranged to ensure distancing, and capacity limits will be enforced, as per Government guidelines.
- All arrival areas, tea break and foyer areas will be demarcated with grids, bollards, tapes, etc. for spacing and queue management.

RETAIL

- In coordination with our retail partners and tenants, occupancy limits will be enforced to allow for appropriate distancing at our owned and leased retail spaces.

VEHICLES

- Regulations may determine vehicle capacities, and internal processes will be amended where required.
- Passengers may not occupy the front passenger seat.
- In standard sedans, only one person may be seated in the rear, unless guests are from the same small family/friend group.
- In larger luxury vehicles and SUVs, two people may sit in the back – middle seats will not be available for use.
- In minibuses, 70% capacity with a seat between each individual will be allowed.
- Where possible, physical barriers will be installed to shield and protect the driver, or the driver will be equipped with a face shield.

SECURITY

- Standard Protocols will be followed unless a specific incident requires more invasive contact (i.e. taking a subject into custody for a criminal offence).
- Security Officers will assist with enforcing physical distancing Protocols in guest queuing areas (restaurants, casino floors, registration areas, elevator lobbies, etc.), as required.

BACK-OF-HOUSE

- Where practical, employees will be scheduled to work staggered shifts in teams, which will be rotated to ensure physical distancing and capacity limits are adhered to.
- Where possible, employees staggered shifts should commence in off-peak times to reduce the pressure on public transport and avoid overcrowding.
- Where possible, all office, work, food and beverage spaces will be re-arranged to ensure physical distancing between employees. If possible, opposite-facing workstations will be eliminated, or physical barriers will be provided between facing or side-by-side stations.
- Canteens, change rooms, training rooms, shared office spaces and other high-density areas will be re-arranged or controlled through supervision, queuing or staggered work breaks to ensure physical distancing.

PHYSICAL BARRIERS

Where physical distancing is not achievable, we may install physical barriers or provide our employees with face shields. The purpose of these barriers or face shields is to protect employees, and the guests' faces and eyes from potential exposure to infectious droplets.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

GUESTS

Guests and visitors will be required to wear masks except when in their Hotel rooms or seated in a Hotel dining or bar area for eating and drinking. Cloth, surgical/medical and N95 respirator masks are acceptable. We expect that most guests and visitors will have a mask(s); however, our units have spare surgical, and cloth masks for sale should guests not have their own. If a guest does not have masks for a multiple-day stay, multiple masks can be provided. Our Hotels have a cloth-mask laundry service which may be utilised upon request. Small sealable bags are located in the Hotel room in which used masks can be submitted for laundering. Cloth masks will be returned in a clean, sealed bag.

EMPLOYEES AND OUTSOURCED WORKERS While cloth masks are not considered PPE, we are grouping this requirement under this section. On the first day of returning to work, employees will be issued with three cloth face masks, which they will be required to wear while at work and when commuting to and from work. We will provide training and instructions on how to effectively use, clean and disinfect their masks, which will be the employee's responsibility. A fabric/cloth face mask (non-medical mask) for the general public is only part of a broader solution to curb the spread of COVID-19. It must always be used in combination with other hygienic methods of prevention. Such masks are therefore not a replacement for other recommended precautionary measures. They should not provide a false sense of protection that may lead to a lapse in the application of proper preventative measures like personal hand and respiratory hygiene and physical (social) distancing. Based on their role and responsibilities, and in adherence to legislation and guidance, employees may be required to wear additional PPE.

Other PPE requirements may include:

- Disposable or reusable gloves depending on the hazards associated with their job
- Disposable shoe coverings for employees working in laundries
- Disposable gloves and aprons for housekeeping when cleaning bathrooms. They will also be required to sanitise their hands and shoes, and don a new disposable apron before entering the next room.
- Disposable plastic aprons for clearing and wash-up functions
- Laundry attendants will be required to wear disposable gloves, masks, boiler suit/disposable aprons and shoe coverings.
- Disposable gowns or aprons are required for waste disposal.
- Gloves and disposable aprons are required for vehicle cleaners.
- Shoe protection or safety boots and disposable aprons will be required for employees receiving deliveries.
- Face shields will be required for employees likely to work close to guests and where physical barriers are impractical to install.

AWARENESS

Various awareness measures have been implemented as a Group, and at our business units, to ensure that our people are made aware of how we are protecting them, and of the necessary personal hygiene measures they must implement to protect themselves during this time. Daily and weekly updates are provided on our website

(<https://www.echomountaininnthabazimbi.com>) to inform guests on any new developments about COVID-19 and its impact on our business operations. We also have an internal communications platform that is used to inform our employees of all relevant information relating to COVID-19. At our properties, signage, digital displays, or both, will be available to inform our people on the following critical topics:

- Dangers of the virus and how it is transmitted
- Where people can go for testing
- What we are doing to protect our people
- Our access control requirements
- Correct handwashing and hand sanitisation practices
- How cloth masks should be used
- How disposable masks should be handled
- How to practice hand and respiratory hygiene
- How to practice physical distancing, including spacing requirements when queuing
- Floor signage markings in all queuing areas

TRAINING

Our employees will receive training before we reopen, and regular refresher training either through e-learning or in classrooms. At a minimum, the following topics will be covered:

- Legislative background relating to COVID-19
- The employer and employee's respective duties
- What is COVID-19, how it is spread, risk factors, symptoms, how long it survives on surfaces, and protective behaviours required (e.g. personal hygiene, respiratory hygiene, physical distancing, PPE, etc.)
- What the Company is doing to protect our people, including information regarding incident management, employee wellness, shift staggering and dedicated separate shift teams, separation of duties, entry and exit queues and procedures, locker use, canteen use, etc.
- How to use and care for cloth masks, and the unit Protocols for washing and issuing of masks
- Our approach to medical surveillance and self-assessment screening requirements
- Measures to be taken if they have symptoms
- Protective measures to be taken outside of the workplace
- Specific management training
- Specific training on PPE, including how to put it on, use/wear it, take it off correctly, clean, store or discard appropriately (where applicable)
- Employees with frequent guest exposure such as housekeeping, food and beverage, front office, security, and others will receive additional on-the-job training regarding the risks associated with their functions.

EMPLOYEE ASSISTANCE AND COVID-19 PROTOCOLS

ASSISTANCE Echo Wellness is our employee wellness programme which assists employees and the Company in managing psycho-social factors, mental health, general wellbeing and management of absenteeism. The following core functions are available through the programme:

- Counselling and advice in respect of work-related issues, health, financial, trauma, relationships, personal, legal, stigma, and fear
 - Sick absence management and sick-note verification
 - On-site testing to identify co-morbidities through voluntary disclosure
 - Management of co-morbidities: - HIV via Medical Scheme and LifeSense Disease Management - Diabetes, asthma/COPD, hypertension via Healthcare Funders - Referrals initiated when risks are detected in on-site testing and promoted via communication to encourage active disease management - Mitigation of obesity risk through our LifeTrack Shape Challenge

COVID-19 PROTOCOLS

Vulnerable employees (those who are older or have co-morbidity conditions) will be required to disclose this information to their COVID-19 Compliance Officer, or HR. Vulnerable employees will not be allowed to work, other than from home, until the employee has satisfied the Company that their physical conditions do not place them at higher risk or until special measures have been put in place, or both.

Where the employee's position and circumstances allow them to work from home, this will be done subject to the provisions of the unit's return-to-work plan. If there are no special measures that are appropriate at the workplace, and the employee is unable to perform their work remotely, the provisions of incapacity or other relevant labour practices will be applied.

The Company reserves the right to engage the services of a medical practitioner to give a prognosis or advice on the best way to deal with vulnerable employees, or both.

Where operationally possible, employees will be allocated to separate shifts or shift teams per area or function. This allows for employees to be rotated fairly, ensuring that all employees have an opportunity to work for while operational levels remain low, and to limit potential spread should one team member become infected.

As operational levels increase, the allocation of employees to shift teams may no longer be possible due to the nature of our business.

Where possible, employees in teams will be required to work, eat and arrive separately, so there is no potential for exposure between teams.

Where possible, office-based employees will be required to work from home for some time.

Where possible, employees' shifts should commence in off-peak times to reduce the pressure on public transport and avoid overcrowding. Shifts will be slightly staggered to avoid queues at employee entrances and congestion in locker rooms/changing rooms and canteens. Locker/change room times will be scheduled to allow for smaller groups at any one time.

Pre-shift employee meetings will be conducted in areas that allow for appropriate physical distancing between employees.

Larger departments will stagger employee arrival times to minimise traffic volume in the back-of-house corridors and service elevators. Hand sanitisers are available at clock-in locations, and employees will be required to sanitise their hands after clocking in. Employees who commute to and from work will be required to:

- Disinfect their vehicle at least weekly, or every day if they use a lift club to commute to work.
- When using public transport, keep a regulatory cloth mask on at all times, minimise contact with others, avoid touching their face, and sanitise their hands at all entry and exit points.

In addition to our access control requirements, employees will undergo a sanitising process including spraying or wiping hands, shoes, bags (including handbags, backpacks and laptop bags), and cellphones before or just after entry.

Headsets, personal computers, desks, telephone, etc. will be allocated to an employee for their exclusive use. All office work functions, such as consultations, bookings, and enquiries, will be done by telephone or online with no walk-ins.

Where possible, windows will be opened to improve ventilation.

Alternatively, where windows are not available, ventilation will be improved through mechanical means.

As a general principle, all travel, whether local or international, shall be on a needs- and essential-basis only.

Similarly, face-to-face engagements at the workplace should only take place if necessary.

Furthermore, the Protocols of the regulations on air travel, hospitality and other related aspects of travel shall apply at all times.

In any event, the first port of call should be to consider online platforms for engagement. Should they not be appropriate given the purpose and context of the engagement, then travel will be considered (both into and external to the workplace).

Similarly, employees may not attend face-to-face conferences and training without the express written permission of a senior manager. Such engagements should be done online without the need for face-to-face meetings.

Face-to-face meetings should only be arranged where other distance-based engagements are not appropriate, given the purpose and context of the meeting. If a face-to-face meeting is to proceed, then the minimum number of individuals should attend, and the meeting room must be capable of accommodating all attendees at the required physical distancing.

The meeting convenor should always convey the Company's commitment to this policy and advise the attendees to comply with the policy at all times.

A register of the attendees must be maintained and kept for at least two months; this will be crucial for contact tracing should an attendee later test positive for COVID-19. COVID-19 holds serious consequences for the health and safety of individuals and the sustainability of our business.

Accordingly, any breach of these standards and other accepted norms will be seen in a serious light and may result in disciplinary action.

Each case will be dealt with on its own merits.

All HR policies have been updated to reflect the changes required as a result of the COVID-19 operating environment.

Where outsourced workers are concerned, the outsourced company will be responsible for providing updated safety files, ensuring their employee records are kept up to date and that their employees follow all standard operating procedures as provided by Echo Mountain Inn. They will also be responsible for keeping the same employees on the same shifts or teams and identifying vulnerable workers for additional attention.

REVISED OPERATIONAL PROTOCOLS

OVERALL

Trading Hours:

Monday till Friday: 10am till 20pm

Saturday: 10am till 5pm

Sunday: Closed

SUMMARY CHANGE TO RULES AND REGULATIONS IN LINE WITH ADVANCED LEVEL:

1. All persons must complete a short survey before entering the Building (This includes a temperature check, Full Name and Surname, ID number, Contact number, Temperature, Date and Time) This survey must be completed every time the persons enters the building
2. Prior to entering, hands must be sanitized
3. Prior to playing, the slot machine will be wiped down and sanitized (for every new player)
4. One machine per person
5. Until our screens are installed, (Or machines moved 1.5 meters apart) every second slot machine will be active
6. Only players are allowed inside the gaming area, no visitors or persons standing by is allowed
7. Waiting lounge will be available outside of the gaming area for persons waiting to play on a machine
8. No Smoking is allowed inside the building including but not limited to the gaming area
9. No alcohol is permitted to be in possession of anyone, sold or consumed on/in/around the premises
10. Only persons 18 years and older will be allowed to enter the premises, no persons under 18 years will be allowed on to the premises and/or inside the building
11. NON- Alcoholic beverages will be available for purchase, However, these beverages will be served in plastic cups - These Cups must be thrown away upon exiting the premises, Cups may not be shared.

12. Hotel is also open to all business travellers.

13. The Alcohol Bar and Restaurant will however remain closed until further notice.

In accordance with regulations.

FOOD AND BEVERAGE

In accordance with regulations guiding our industry, our Hotel breakfast offerings will change as follows:

- Cold continental items will be served in individual pre-portioned receptacles in a semi- buffet presentation.
- Items such as single-serve yoghurt and juices will be served in their original packaging. • Hot items will be available via a limited á la carte menu.
- Where possible and operationally dependant, a full hot food and cold continental limited á la carte menu will be available.
- Where possible, receptacles and single-use disposable containers will be used.
- Hot beverages will be provided by service staff. The above will significantly assist in reducing staffing levels in our kitchens, ensuring physical distancing, and will also result in reduced menu options to accommodate the reduced workforce. Menus will be displayed on menu boards where possible, and increased hygiene practises pre- and post-service will apply after each guest interaction. Alternatively, and where operationally dependant, single-use disposable menus will be on offer. Table appointments will be minimal with only salt & pepper shakers/grinders and a centrepiece. Items required as part of the service sequence and meal, such as condiments, sugars, sauces and meal accompaniments, will be brought to the table in single-use single-serve packaging. Appropriate cutlery for the meal and course being served will be provided in a closed paper sleeve including the napkin. Tables, table appointments and surrounds will be wiped and sanitised post service before welcoming and seating the next guests. When serving guests, the necessary physical distancing and precautionary measures will be taken to safeguard our guests and our employees. Food and beverage items will be placed on tables instead of handing directly to guests.

Room service will adhere to hygiene practices and social distancing. Tray/trolley setups will be aligned to the meal type, with service staff adhering to delivery and collection service sequences. Minibars will be stocked with water only, but guests may request other beverages be stocked. Refreshments will also be available through room service. Bars will be staffed to allow for appropriate physical distancing amongst employees, and the seating capacity will be reduced. Bartenders are responsible for mixing and garnishing beverages, providing straws – on request only – and will only touch the outside of the glass. Where possible, decanting of beers, soft drinks, and ciders should only be done on request from the guest and, adhering to regulations. Bar snacks will be provided in single portion servings individually packaged per guest and not shared by the table. Quality individual pre-plated hot and cold snacks will still be available on all-day dining menus.

HOTEL ROOMS

Upon arrival, all guests will be asked whether they want their room serviced during their stay; this will include the turn-down service in our 5-star Hotel. The turn-down service will only be available upon request.

For long-duration stays, the frequency of room cleaning will be reduced to every two to three days.

Linen changes will take place when the guest departs or every four days for longer duration stays unless otherwise requested by the guest.

Hand sanitiser with 70% alcohol will be added to our range of guest amenities for guest use during their stay. All non-essential guest amenities will be available upon request.

All excess cushions, throws, extra blankets, and décor items will be removed to reduce surfaces. These will be available upon request.

All other non-essential items such as sewing kits, shoe cleaning kits, irons, and magazines will be available upon request.

All in-room Hotel guides will be available as an electronic guide.

All minibars will be emptied with only bottled water available; other beverages and snacks are available upon request.

The contents of housekeeping trolleys will be reduced to include a minimal quantity of guest supplies.

Our check-out and check-in times may be amended to ensure that housekeeping has sufficient time to thoroughly deep clean rooms.

Where possible, windows will be opened during room cleaning to ensure adequate ventilation.

CONFERENCES AND FUNCTIONS

All conferences and functions will be subject to regulations regarding permitted events and size. In any event, conferences and meetings will be operated on a similar basis to other public areas and restaurants, with revised floor plans and reduced capacities at 50% to ensure physical distancing between delegates. Cocktail functions will not be held. Only individual water and mints will be provided. Pens and paper will be provided, and delegates will be instructed to keep these in their possession for the duration of the meeting or conference. Leftover paper and pens will be wiped or disposed of.

RETAIL

Our retail areas may operate and sell items subject to Government regulations. Signage displaying maximum occupancies and distancing guidelines will be displayed.

KIDS PLAY AREAS AND GAMES ROOMS

No persons under the age of 18 years will be allowed on to the premises.

APPENDIX A – COVID-19 ENTRY TO PREMISES TERMS AND CONDITIONS

1. I hereby acknowledge that these premises are owned and or are operated by Echo Mountain Inn directly or through a subsidiary within its Group of companies (“MackenzieGroup”)

2. By completing this screening questionnaire to enter these premises, I confirm, to the best of my knowledge, that I am not infected with COVID-19, have not been in contact with any person who has been infected, and have not travelled to any destination that is considered a high-infection rate area.

3. I also agree and give express consent to Echo Mountain Inn and its agent(s) to obtain, process and further process my Protected Personal Information (PPI) for any lawful purposes relating to its COVID-19 preventative measures implemented at these premises.

I understand that my PPI is the prescribed information falling within the definitions of personal or special personal information as set out in the Protection of Personal Information Act of 2013. My PPI includes, at the least, my full names and surname, ID number, address, and telephone number.

The obtaining and processing of my PPI allows, at a minimum, for Echo Mountain Inn to:

- Record my Protected Personal Information.
- Meet any lawful obligation imposed on it.
- Furnish my Protected Personal Information to any authority and entity which is part of MackenzieGroup - Group of companies for purposes of giving effect to the promotion of COVID-19 restrictions and preventative measures.
- Perform any statistical and other analyses to identify potential risks, persons and trends concerning COVID-19.
- Doing any other thing to further its legitimate business interests to the full extent permissible by law.

4. Furthermore, I agree and consent to Echo Mountain Inn retaining my PPI for such periods as deemed necessary by Echo Mountain Inn for its legitimate business purposes and record-keeping Protocols.

5. I accept that Echo Mountain Inn takes reasonable and practical steps to safeguard PPI in its possession. To the fullest extent permissible by law, I hereby indemnify and hold Echo Mountain Inn, its employees and agents harmless against any liability, damages and/or legal action whatsoever and howsoever arising, including negligence on the part of Echo Mountain Inn, its employees or agents. Echo Mountain Inn shall not accept liability for any damages or any type of loss suffered by me.

6. Echo Mountain Inn reserves the right to refuse me access to these premises should I present any signs or symptoms in relation to the COVID-19 virus, or in the event that I am not fulfilling the purpose for which I entered these premises, or my conduct within these premises is undesirable for purposes of promoting COVID-19 preventative measures.

7. In the event that Echo Mountain Inn makes any indulgence or deviation of these terms and conditions in favour of me, then such indulgence or deviation shall not be misconstrued to be a breach or waiver of these terms and conditions or any rights of Echo Mountain Inn.

8. The above clauses are severable from each other. In the event that any clause or part thereof is unenforceable in law, then that clause or part thereof shall be severed from these terms and conditions, and the surviving clauses and parts thereof shall remain in force.

APPENDIX B – LIST OF STANDARD OPERATING PROCEDURES

We are continually updating our Standard Operating Procedures (SOPs) currently in place for all areas to include specific provisions on increased personal hygiene, workspace hygiene, and the necessary physical distancing requirements. At present, the following SOPs have been updated:

CASINO (VSLLOTS)

- General Operations Hygiene Protocols
- Slots Operations Hygiene Protocols
- Cash Desk Operations Hygiene Protocols
- Limited Social Interaction and Physical Distancing Protocols
- Back of House Hygiene Protocols

FOOD AND BEVERAGE

- Pre-opening
- Closing
- Manager pre-opening inspection
- Manager closing inspection
- Manager in-service inspection
- Tray layout breakfast
- Tray layout Lunch/Dinner
- Table Layout
- Guest Arrival
- Order Taking
- Service
- Manager Service inspection
- Manager Shift Change Inspection
- Order Billing
- Breakfast Service
- Briefings
- Grooming and Behaviour
- Inventory receiving, storage safety and hygiene
- Cleaning

HOTEL

- Guest Check-in
- Group Check-in
- Guest transfers
- Hotel vehicle standards
- Shuttle service
- Entering a guest room
- Rooming a guest

HOUSEKEEPING

- Back-of-house
- Bathroom Cleaning
- Cleaning a guest room
- Houseman duties
- Public areas
- Supervisor Duties

HEALTH AND HYGIENE

- Mail Room and Parcels SOP
- Minimum Cleaning Requirements SOP
- Community projects OHS SOP
- Thermal Scanning SOP
- Access Control SOP
- Incident Management SOP
- Employee Hygiene SOP
- Cloth Mask SOP
- Employees with comorbidities Policy

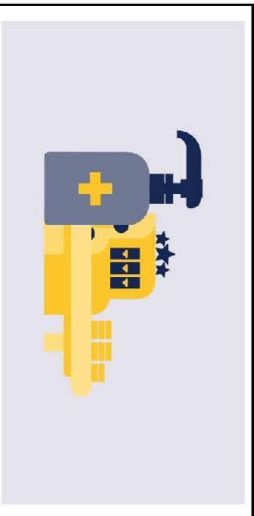
ECHO MOUNTAIN INN VSLOTS THABAZIMBI COVID -19 PLAN



Employees are required to sanitise their hands before starting their shift, between guest interactions and after handling cash.



All cash desks, card machines and devices, Cash IOs, promo kiosks and pay desks will be sanitised after each guest interaction.



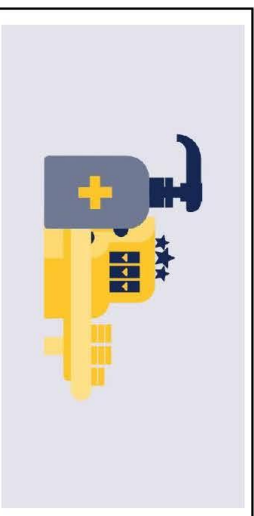
Hand sanitiser will be made available throughout the gaming floors and at tables, for guests to use.



All tables equipment and furniture will be cleaned on a scheduled basis or between games.



Only 70% alcohol-based hand sanitisers are used at Echo Mountain Inn.



Every second slot machine will be turned off or locked to ensure a 1.5-meter distance. Alternative screens will be installed.