



DAVID E. SIMON
CHAIRMAN, CHIEF EXECUTIVE OFFICER & PRESIDENT

April 29, 2020

The Honorable Christopher T. Sununu
Office of the Governor, State House
107 N. Main Street
Concord, NH 03301

Dear Governor Sununu,

It is critically important that we restart the economy and get New Hampshire back to work as quickly and safely as possible.

Retail is a significant and vital segment of the New Hampshire economy. Simon alone provides more than 6,600 jobs at our four properties and contributes \$15 million in property tax revenue to the State. More broadly, the retail sector employs over 95,000 New Hampshire residents, more than most other sectors of the State's economy.

It is therefore imperative to reopen retail as soon as possible to stem the economic hardship New Hampshire residents are experiencing, and do so in a safe and orderly manner. Simon is uniquely suited to be the vanguard for our industry, leading a successful transition from shutdown to resuming operations, beginning on 5/1 with the reopening of our first set of properties. We'd like to open our four properties in New Hampshire as soon as possible in the first half of May.

We have established a comprehensive set of protocols designed to keep all New Hampshire residents safe as we reopen our properties and get New Hampshire residents back to work and back to shopping. These protocols have been reviewed and endorsed by experts in the Environmental, Health and Safety (EHS) industry, including Keramida, a leading global EHS services firm and by Dr. Jiali Han, Ph.D., a world-renowned epidemiologist and public health researcher and member of the IUPUI's Fairbanks School of Public Health.

These protocols establish procedures for the mitigation of known or suspected transmission pathways for COVID-19 and are designed to shield our employees, store employees, vendors, and shoppers from exposure to the virus.

While the attached document outlines in detail all the steps we are taking to safeguard our community, I wanted to take this opportunity to highlight some key aspects of our rigorous safety protocols:

- **Preemptive Employee Screening.** Our employees will be required to screen themselves at home prior to coming to work. If they have a temperature exceeding 100.4 degrees or exhibit flu-like symptoms (e.g., cough, body aches), they will be required to stay home. Additionally, anyone exposed to COVID-19 will be required to quarantine at home until they are symptom free for at least 72 hours and satisfy other CDC requirements prior to returning to work. Similar temperature testing and health screenings in compliance with CDC guidelines will take place upon arrival at the property prior to working. All employees failing the CDC-compliant health screening will be asked to return home. Our tenants, contractors and vendors will be encouraged to implement these protocols.
- **Employee Safety Protections.** Our employees will be trained in COVID-19 safety guidelines, be required to wear facial coverings, as recommended by the CDC, and be encouraged to frequently wash or otherwise sanitize their hands throughout the work day. They will also be instructed to maintain 6 feet of distance from fellow co-workers and shoppers whenever possible. Store employees, vendors and contractors will be encouraged to do the same.
- **Promotion and Enforcement of Social Distancing.** Several steps will be taken to encourage social distancing in our properties:
 - **Occupancy Limitations and Monitoring.** We will utilize existing traffic measurement technologies at our properties to ensure that overall property occupancy does not exceed a targeted level of 1 person per 50 square feet of space. As needed, we will restrict the number of open entrances to the property while complying with local fire code requirements, and have queueing protocols in place to manage traffic. Each retailer will be responsible for managing to occupancy targets set by state or local authorities for their stores.
 - **Proactive Encouragement of Social Distancing Guidelines.** Our employees and our security officers will actively remind and encourage shoppers to maintain the proper distance from fellow shoppers and workers, as well as to refrain from shopping in groups. Tenants will be encouraged to do the same within their stores.

- **Furniture Redeployment to Support Social Distancing.** Food court seating will be limited and spaced in a way to encourage social distancing. Additionally, no reusable customer service items will be available (e.g., trays, utensils, cups, etc.). Common area seating will also be reduced and reconfigured to support social distancing.
- **Temporary Closure of High-Interaction Areas.** All play areas, stroller and valet stations and drinking fountains will be temporarily closed.
- **Coordinated Traffic Flow.** Directional signage and floor decals and arrows will be deployed in the property to encourage better traffic flow, including at entrances and throughout the common area.
- **Restroom Spacing.** In restrooms, every other sink and urinal will be taped off to encourage the proper spacing between individuals.
- **Personal Hygiene.** All property and store employees, contractors, vendors and shoppers will be encouraged to take frequent breaks for handwashing or disinfecting of hands.
- **Mobile/Self-Checkout.** Shoppers will be encouraged to use contactless technology when transacting, whenever possible.
- **Deployment of Traffic Flow Signage and Social Distancing Markers.** We will deploy directional signage and dividers to separate shoppers entering and exiting the property, as well as diners ordering and picking up food in the food court. We will also deploy social distancing markers, where needed, to manage queues (e.g., at food court counters) to maintain 6 feet of spacing.
- **Enhanced Sanitizing and Disinfecting.** Each night, the common area of the property will be thoroughly sanitized and disinfected using products that meet or exceed CDC guidelines. Additionally, during property hours, we will regularly sanitize and disinfect high touchpoint areas, including, but not limited to:
 - Restrooms
 - Door knobs and handles
 - Directories
 - Food court table and chairs

- Escalator and stair handrails
- Elevator buttons
- Vending machines
- Trash bins

Each retailer will be encouraged to comply with CDC guidelines for cleaning and sanitizing their stores.

Finally, business hours will be limited to allow for enhanced sanitizing and disinfecting.

- **Shopper Safeguards.** In addition to the steps outlined above, we will also implement the following measures to further protect our shoppers:
 - **Health Pre-Visit Screenings.** Shoppers will be encouraged to take their temperatures and perform health checks prior to visiting our properties and refrain from visiting a property if they are exhibiting any flu-like symptoms. Anyone exposed to COVID-19 will be expected to remain at home in quarantine until they are symptom free for at least 72 hours and satisfy other related CDC requirements.
 - **Individual Personal Protection.** All shoppers will be encouraged to wear masks or facial coverings while shopping. They will also be encouraged to frequently wash or otherwise sanitize their hands while shopping, and we will make available sanitizing stations throughout the property. Additionally, we will also provide, free of charge, masks and individual sanitizing wipe packets to shoppers requesting them. Finally, we will make free temperature testing available to shoppers, using infrared thermometers.
 - **Healthy Tips and Social Distancing Reminders.** Signage will be deployed at all entrances and throughout the property reminding shoppers of their part in keeping everyone safe. Representative examples of what shoppers can do to keep safe and what we are doing to keep them safe are enclosed. Also attached is a set of illustrative examples of the social distancing measures supporting our protocols. Additionally, we will make regular announcements over our audio system to remind shoppers of their part in maintaining a safe environment for everyone.

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As you can see, we have rigorously and comprehensively analyzed the shopping experience and designed a complete set of protocols in order to keep everyone as safe as possible when we reopen our properties. These protocols meet or exceed guidelines published by the CDC and are more robust than many of the measures deployed by essential businesses and online fulfillment centers that have remained open during this crisis.

Lastly, our properties are an integral part of our communities. Not only is it important to reopen our properties and get people back to work and restart the economy, but it is also vital that we leverage this opportunity to help in the broader recovery of the communities we serve. Accordingly, we are working with the Red Cross, Feeding America and local food and blood banks as part of our reopening efforts. We will be providing space and support to these charities and will be encouraging shoppers to contribute what they can to support New Hampshire residents in need.

With your approval, we are ready, willing and able to reopen our properties and execute the protocols outlined above and detailed in the enclosures and lead New Hampshire and our industry back to business, while delivering a new, elevated standard of safety for all. At the very least, we'd like to open our outdoor center in your state which benefits from the same dynamics as other outdoor environments.

I look forward to your response.

Regards,



David E. Simon
Chairman, CEO and President of Simon Property Group

Enclosures: Simon Property COVID-19 Exposure Mitigation Protocols
Reopening Shopper.Public.Employee Facing Illustrative Examples
What We're Doing To Keep You Safe On-Property Signage
Healthy Shopper On-Property Signage



Simon Property COVID-19 Exposure Mitigation Protocols

1.0 Purpose

The Simon Property Group (Simon) Exposure Mitigation Protocols (Protocols) are designed to mitigate property employees, store employees and shoppers from potential COVID-19 exposure by means of identification, evaluation, and control of pathogen transmission factors in the workplace. These Protocols are intended to establish procedures to address known or suspected pathogen transmission pathways and for mitigating the spread of COVID-19 in the community.

This document has been prepared and approved by the following:

- Mr. Daniel Engling, Certified Industrial Hygienist – Director of Industrial Hygiene Services, KERAMIDA, Inc. Mr. Engling earned his BS in Public Health from the Indiana University Fairbanks School of Public Health
- Dr. Jiali Han, Ph.D., Principal at Integrative Precision Health LLC. Dr. Han is a world-renowned epidemiologist and public health researcher. Dr. Han earned his Ph.D. in Biological Sciences in Public Health from Harvard University. He has twenty years of research experience with over 220 peer-reviewed publications

2.0 Responsibilities

- Corporate Management – Ensures that the content of these Protocols are managed effectively, and that these Protocols are reviewed and evaluated for effectiveness and updated as necessary
- Property Management – Ensures that these Protocols are appropriately supported and implemented. Property Management will also ensure these Protocols are readily available for examination and copying, upon request, by each employee and their designated representatives
- Simon Employees – Ensure that these Protocols are understood and followed. Any deviations from these Protocols through work practices or changes/failures in equipment are to be promptly reported to supervisors.

3.0 Definitions

- Pathogen – Organisms (e.g. bacteria, viruses, parasites and fungi) that cause disease in human beings (CDC)
- Exposure – Contact with a substance by swallowing, breathing, or touching the skin or eyes (CDC)
- COVID-19/SARS-CoV-2 – COVID-19 is the condition caused by the SARS-CoV-2 virus
- COVID-19 Symptoms – Fever (body temperature greater than 100.4°F), dry cough, shortness of breath or difficulty breathing, and other flu-like symptoms (e.g., chills, repeated shaking with chills, muscle pain, headache, sore throat) (CDC)
- Hand Sanitizer – Hand hygiene fluid with greater than 60% alcohol (CDC)

4.0 References

- www.cdc.gov
- www.epa.gov

5.0 Potential Sources

The following is a list of locations identified as potential exposure points for each of the listed groups.

Customers/Public/Employees

- Direct Customer/Public/Employee Contact
- Common Area Touchpoints/Seating
- Restrooms
- Goods
- Payment Processes

Employees

- Workspace Surfaces
- Tools
- Equipment
- Break Areas
- Employee-Only Area Touchpoints

6.0 Property Operations

6.1 Measures to Reduce Employee Exposure

Work Attendance

- **Preemption** – Employees capable of carrying out work duties from home will be directed to do so
- **Self-Screening** – Our employees will be informed that they should not report to work if they are experiencing symptoms of COVID-19 or have experienced symptoms in the 72 hours prior to start of shift. Any symptoms should be communicated to their respective supervisor
- **Pre-Work Screening** – Upon reporting to work, employees' body temperatures will be measured with a thermometer and assessed. Employees with body temperatures greater than 100.4°F or who have flu-like symptoms (e.g., cough, body aches) will not perform on-site work duties and will be directed to return to their homes. Any symptoms should be communicated to their respective supervisor

Property Employee / Back of House Practices

- **Training** – Our employees will be trained in COVID-19 safety guidelines and these Protocols. We will encourage our tenants, vendors and contractors to implement this training
- **Social Distancing**
 - Desks and workstations will be separated by 6 feet or more or separated by a barrier
 - Employees will be required to adhere to state and local guidelines for social distancing which are generally 6 feet of distance between individuals
 - Signage will be posted reminding employees of CDC hygiene and safety guidelines
- **Personal Protection Equipment (PPE) Use** – Facial coverings, as recommended by the CDC, will be worn by our employees while on property performing work duties or interacting with other persons or as mandated by state and local jurisdictions. We will encourage our tenants, vendors and contractors to implement the same precautions.

- **Personal Hygiene** – Our employees will be allowed and encouraged to take frequent breaks for handwashing or disinfecting of hands with a sanitizer. Hand washing must be performed with soap and water for at least 20 seconds, as recommended by the CDC
- **Enhanced Sanitizing and Disinfecting**
 - The following areas will be disinfected regularly during the day and upon indication of additional need
 - Breakrooms
 - Restrooms
 - Counters
 - Workstations
 - Employee-Only Areas
 - Touchpoints, including the following, will be disinfected frequently and upon indication of additional need:
 - Transaction Registers/Computer Touchscreens/Keyboards
 - Shared Communications Equipment Including: Phones, Radios, etc.
 - Light Switches
 - Doorknobs/Door Handles
 - Copy Machines/Multi-Function Machines
 - Counters
 - Drawer Handles, Etc.
- **Self-Service Customer Transactions**
 - When paying by credit/debit card, Customers should utilize credit card receptacles without exchanging the card with an employee
 - During each transaction, employee and Customer should maintain at least 6 feet of separation or be separated by a transparent barrier
 - Employees should wash hands or utilize hand sanitizer after each Customer transaction
- **COVID-19 Case Notification and Mall Office Recovery** – In the event one of our employees tests positive for COVID-19, we will notify the appropriate public health care authorities, and take the necessary steps to deep clean and sanitize the affected workspace

6.2 Measures to Protect Customers/Public

- **Reduced Occupancy** – Human occupancy within the property will be limited to a maximum density of 50 square feet per person. If the targeted occupancy is achieved,

other Customers/Public will be asked to wait in their cars or in queue lines outside, spaced 6 feet apart

- **Social Distancing**

- Dividers will be placed in entryways requiring incoming traffic to walk on only one side of entry, and outgoing on the other side to encourage visitor separation of at least 6 feet
- On-property security staff will actively remind and encourage Customers/Public to comply with the social distancing standards
- Social distancing markers will be placed in queue areas (e.g., food courts, restrooms)
- Elevator occupancy will be limited to encourage proper spacing (max. of 4 per cab)
- Public seating and eating areas will be reduced and/or reconfigured to allow for minimum separation of 6 feet between persons
- Dining Pavilion seating area will be opened up section by section as occupancy requires, while still maintaining the required spacing. This will allow cleaning crews to concentrate their efforts and increase frequency of cleaning. No reusable customer service items will be available (e.g., trays, utensils, cups)
- Order areas and delivery areas will be separated to encourage social distancing
- Customers/Public in queue lines or on escalators will be directed to maintain a distance of 6 feet from other individuals by means of signage and/or other markings at 6-foot intervals
- In restrooms, every other sink and urinal will be taped off to encourage proper spacing, and signage will be posted encouraging proper hygiene
- The following interior touchpoints will be temporarily placed out of service:
 - Child Play Areas
 - Drinking Fountains
 - Valet Use
 - Strollers
- Signage and floor decals will be placed to encourage social distancing throughout the property

- **Enhanced Sanitizing and Disinfecting**

- Soap and water will be made available to employees and Customers/Public in restrooms
- Hand sanitizer or sanitizing materials, compliant with CDC standards, will be available to everyone in common areas and retail spaces. Signage and/or staff will be deployed to encourage the use of hand sanitizer

- **Limited Large On-Property Events** – Large marketing events and activities that draw big crowds have been postponed

6.3 Retail Store Measures to Protect Customers/Public

Stores will be asked to follow the procedures below:

- **Training** – Store employees should be trained in COVID-19 safety guidelines
- **Self-screening** – Store employees should be informed that they should not report to work if they are experiencing symptoms of COVID-19 or have experienced symptoms in the 72 hours prior to start of shift. Any symptoms should be communicated to their respective supervisor
- **Pre-Work Screening** – Upon reporting to work, the store employees' body temperatures should be measured with a thermometer and assessed. Employees with body temperatures greater than 100.4°F or who have flu-like symptoms (e.g., cough, body aches) should not perform on-site work duties and should return to their homes. Any symptoms should be communicated to their supervisor
- **Personal Protection Equipment (PPE) Use** – Tenants should provide masks or facial coverings as recommended by the CDC and sanitizing products for their employees. Store employees should wear masks or facial coverings while on property and frequently wash or otherwise sanitize their hands
- **Reduced Occupancy** – Tenants should monitor and manage store occupancy to targeted level set by state or local authorities
- **Personal Hygiene** – Employees should be allowed and encouraged to take frequent breaks for handwashing or disinfecting of hands with a sanitizer. Hand washing must be performed with soap and water for at least 20 seconds, as recommended by the CDC
- **Social Distancing** – Steps should be taken to encourage 6 feet of distance between individuals on properties. Signage, stanchions and other appropriate measures should be implemented to maintain and encourage social distancing requirements
- **Enhanced Sanitizing and Disinfecting**

- Regularly sanitize and disinfect high touchpoint areas (e.g., counters, POS terminals/cash wraps, screens) throughout the day
- Provide enhanced sanitizing and disinfecting every evening after the store closes for business
- All sanitizing and disinfecting should be performed with CDC-compliant cleaning products
- **Self-Service Customer Transactions** – Customers should be encouraged to pay using mobile technology or self-service POS terminals wherever possible
- **Package Handling** – Store employees should follow the latest guidelines on the handling and processing of inbound/outbound packages
- **Sampling** – Tenants should reduce, reconfigure or eliminate product sampling, or tasting
- **COVID-19 Case Notification and Store Recovery** – In the event an employee tests positive for COVID-19, the tenant should immediately notify the CDC and local public health officials and take necessary steps recommended by the CDC, which include thoroughly sanitizing and disinfecting the store and affected work areas

6.4 Customer/Public Guidelines

Customers/Public will be encouraged to:

- **Self-Screening** – Perform a self-health check prior to visiting the property. Anyone with a temperature greater than 100.4°F or who has flu-like symptoms (e.g., cough, body aches) will be advised not to visit the property
- **Personal Protection Equipment (PPE) Use**
 - Customers will be encouraged to wear facial coverings as recommended by the CDC
 - Free masks and sanitizing wipe packets will be available to shoppers at designated entrances or at the mall office
- **Social Distancing** – Customers will be encouraged and reminded to maintain 6 feet of separation with others by way of:
 - On-property signage
 - Public service announcements
 - Active and ongoing encouragement by property security staff

- **Personal Hygiene**
 - Refrain from touching their nose, mouth, and eyes
 - Wash their hands on a frequent basis with soap and warm water for at least 20 seconds
 - Use sanitizer stations in the common areas of the property to keep their hands clean

6.5. Digital Communication and Signage

- At all public entrances, customers will be asked to refrain from entering the property if they, or anyone they have been in contact with, are experiencing symptoms of COVID-19 or have experienced symptoms in the 72 hours prior
- Measures (signage or staff) will be deployed to encourage the use of hand sanitizer
- While visiting the property, customers will be instructed to adhere to state and local guidelines for social distancing which are generally 6 feet of distance between individuals, including at the following locations:
 - Entrances
 - Escalator and Elevator Landings
 - Directories
 - Restaurant Counters
- Directional floor decals and arrows will be used to promote better traffic flow in the property
- Directional entrance door signage will be used to separate shoppers entering and exiting the property
- Signage will be posted at gift card check-out workstations with customer-facing instructions for conducting transactions
- Regular announcements will be made over the property's audio system reminding shoppers of their part to keep everyone safe

Property Cleaning/Sanitation

- **Personal Protective Equipment (PPE)** – All janitorial staff will be equipped with personal protection equipment, including facial coverings and gloves recommended by the CDC

- **CDC Recommended Disinfectants**
 - Disinfectant and disinfectant materials, as recommended by the CDC, and related supplies will be made available to all janitorial employees assigned to sanitation tasks
 - Disinfectants will be selected from the EPA list of chemicals designated as effective against SARS-CoV-2 virus and used in accordance with or exceeding CDC sanitation guidelines

- **Enhanced Sanitizing and Disinfecting**
 - The following will be disinfected regularly throughout the day and upon indication of additional need:
 - Restrooms
 - Directories
 - Seating areas
 - Tables
 - Recharging Stations
 - Chairs

 - **High Touchpoint Areas** – Interior high touchpoints areas, including the following, will be disinfected frequently and upon indication of additional need, using EPA-approved sanitation chemicals and in accordance with CDC guidelines:
 - Food court tables, chairs and counters
 - Restrooms
 - Seating Areas
 - Directories
 - Door Handles/Doorknobs
 - Elevator Buttons
 - Escalator Handrails
 - Stair Railings
 - Trash Bins
 - Guest Service Counters, Phones, POS terminals and Workstations
 - Other Touchpoints, as needed

 - **Enhanced Overnight Sanitizing and Disinfecting** – Properties will be thoroughly cleaned during non-operating hours meeting or exceeding CDC guidelines and recommendations

- **HVAC Systems** – Air quality testing has been completed showing that the indoor air quality at our properties is better than outside air quality. Filters will be cleaned and replaced on a regular basis
- **Reduced Business Hours** – Business hours will be limited to allow for enhanced workspace cleaning and sanitizing

7.0 Updates

7.1 We will continually review and evaluate our exposure control Protocols and update it as necessary and needed.