SUMMARY OF ENHANCED HEALTH & SAFETY PRECAUTIONS

The well-being of our employees, club members, guests and community remains The Breakers’ highest priority. As we closely monitor and adhere to changes in government policy, The Breakers has enhanced our health & safety precautions to comply with the recommendations and guidelines set by the Centers for Disease Control and Prevention (CDC), the World Health Organization (WHO) and the Florida and Palm Beach County Departments of Health. We will continue to elevate our standards as best practices evolve.

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I. A MESSAGE FROM LEADERSHIP

At The Breakers, our family ownership, 2,200 associates, and supportive and loyal guests, club members and community are the heart and soul of our organization. Every effort to support your health and well-being remains paramount to our purpose.

Our senior leadership team has meticulously reviewed every facet and area of our operations to implement enhanced safeguards, some clearly noticeable while others invisible to our visitors. Nonetheless, all are meaningful in regards to how we deliver a safe work environment for our colleagues and a safe, memorable resort experience for our guests.

The purpose of this document is to share the precautions underway. We hope we have anticipated your questions and illustrated that our efforts meet and exceed all government guidelines and industry recommendations. We will continue to update this program as developments that benefit public health progress, and we learn how to best move forward together.

When the time is right for you, we will be here to warmly welcome you back.

Sincerely,

[Signatures]

Paul N. Leone  Tricia Taylor
Chief Executive Officer  Executive Vice President & General Manager
II. HEALTH & SAFETY

Guest Reservations & Arrival: As a condition of making a reservation, guests attest that they are free of COVID-19 symptoms and exposures per the Guest Health Attestation posted on thebreakers.com/updates and within all guest communications, including reservation confirmations and pre-arrival emails. Points of entry to the resort are limited.

Per Executive Order 2020-12, facial coverings must be worn by all guests when entering, exiting and moving throughout indoor, public common areas, including the hotel lobby, Spa and any retail store. In restaurants, facial coverings need only to be worn when entering or exiting the restaurant, or while otherwise away from the table. Facial coverings do not need to be worn outdoors, while actively working out in Ocean Fitness, or while participating in outdoor recreational activities, such as golf, tennis or pool & beach, unless social distancing, in accordance with CDC guidelines is not possible or not being practiced. There is an exception for children under the age of two (2) and other specific circumstances listed within the Order. Posted signage instructs and reminds all visitors of these requirements.

If a guest did not travel with a facial covering, a complimentary, disposable mask will be provided upon request, or reusable face masks are available for purchase at some of our retail boutiques.

Health Concerns: Employee training allows for swift response when reporting all guest or associate presumed cases of COVID-19 to management and Security. Security will engage with our Risk Management Department to coordinate operational protocols.

- For presumptive cases, such as, if a guest advises or displays symptoms of COVID-19, the guest will be isolated to their guest room where they must stay while awaiting departure transportation.
- Isolated guests are prohibited from engaging with others and cannot receive visitors. Hotel staff will be able to deliver food and other supplies that the guest may require, in a contact-free manner. Isolated guests will not receive any housekeeping or in-room services, and they are prohibited from leaving their room and using any resort facilities.
- Our Security Management Team will facilitate medical attention as needed, and departure transportation from the resort.

If alerted of a positive COVID-19 case at the property, our response follows current CDC guidelines.

Medical Services: Should employees or guests express any health concerns, they will be referred to an area healthcare facility for testing and treatment as appropriate.
Sanitizing Resources: Hand sanitizing stations and no-touch waste disposals have been placed in all public spaces and employee entrances, particularly at high-traffic areas and key touch points, such as, elevator landings, pools, spa, fitness center, restaurant entrances, retail stores and inside every meeting room.

Signage: Visual reminders for health, hygiene, required use of facial coverings and social distancing practices are displayed throughout the resort in both guest and employee areas.

Social Distancing: The installation of glass partitions at service desks throughout the resort provide an extra level of precaution for guests and employees. Guests and staff are reminded to remain a minimum of six feet away from others. To accommodate social distancing, restaurant seating, pool chairs and amenities are arranged appropriately. Government mandated occupancy limits are being closely monitored and enforced.

Staffing Capacity: Management determines staffing based on business levels while ensuring the highest standards of service. We are revising our operational plans and service delivery options to maximize our ability to maintain social distancing and provide flexibility for guests who want to minimize human interaction.

III. EMPLOYEE PRACTICES

Benefits: Our employees and their families continue to have access to numerous wellness and financial resources.

Hand Washing: Proper hygiene and frequent handwashing are vital to combat the spread of COVID-19. All employees have been instructed to wash their hands often with soap and water for at least 20 seconds, especially after using the restroom, blowing their nose, coughing or sneezing; before and after eating, going on break and starting a shift. In addition, employees use an alcohol-based hand sanitizer with at least 60% alcohol. Sanitizing stations are available throughout employee areas.

Health Screenings: Upon arriving for work, employees are screened daily for COVID-19 symptoms and temperatures over 100.4°F. Employees with confirmed symptoms or a temperature over 100.4°F are not permitted to enter the property and will be immediately directed toward appropriate medical care.

Personal Protective Equipment (PPE): Employees wear appropriate PPE based on their role and responsibilities, and in adherence with state and local regulations and guidelines. Training on how to properly use and dispose of all PPE has been provided. Every employee has been issued multiple facial coverings and is required to wear them as appropriate.
Policies: Safe return to work guidance is provided to our employees and includes additional personal and medical leave options, protocols for daily health screenings, personal hygiene and social distancing requirements, property and workspace cleanliness standards, business and personal travel policies, and detailed steps for responding to presumed COVID-19 cases.

Pre-Shift & Timekeeping: Daily pre-shift meetings are conducted in areas that allow for appropriate social distancing. Larger departments stagger employee arrival times to minimize traffic volume in back-of-house corridors, stairwells and service elevators. Hand sanitizer is provided next to each time clock location.

Risk Management: The Breakers employs its own Risk and Compliance Manager who is certified in Contact Tracing through Johns Hopkins University.

Shared Employee Space: The use of shared employee spaces has decreased as we practice social distancing and flexible work arrangements. Our employee cafeteria offers grab and go food options and is frequently disinfected especially in high touch areas, such as door handles, tables and chairs. Floor decals mark appropriate social distancing throughout the marketplace, and seating arrangements maintain a minimum of six feet between diners. All office common areas and break areas are cleaned and disinfected daily.

Shared Equipment: Before, during and after each shift, or anytime when transferred to a new employee, shared tools and equipment are cleaned and disinfected. Examples include work phones, keyboards, carts and tools.

Signage: Displayed signage throughout work areas remind employees of the required use of facial coverings, social distancing and personal hygiene practices, such as hand washing.

Social Distancing: Employees practice social distancing whenever possible. This includes seating in all break and dining areas, shared offices, workspaces, meeting rooms and other high-traffic areas. Flexible work arrangements, such as remote work and staggered shift times, reduce employee density.

Training: Employees continue to train in all enhanced health, hygiene and social distancing practices. They are able to recognize and report COVID-19 symptoms and follow the appropriate medical care and isolation procedures recommended by the CDC.

IV. THE GUEST EXPERIENCE

Arrival: Upon arrival at the Security Guardhouse, guests will verify their room or dining reservation, as well as their compliance with the County facial covering requirement. They will then proceed to park. Both self and valet parking are available.
Valet attendants are not permitted to open car doors. Luggage assistance is available upon request. After each use, bell carts are cleaned and disinfected.

**Check-In & Front Desk:** A maximum of two receptionists are stationed at each of our front desks. They utilize every other workstation to ensure separation between employees and minimize shared equipment. The installation of glass partitions separates the receptionist and guest. Individual still and sparkling cans of water are provided upon request.

**Digital Transactions:** Touch-less transactions using email, mobile phone and texts have been implemented throughout the guest experience. Examples include pre-registered check-in, point-of-sale (POS) transactions and express check-out. Guests may text all special requests, including In-Room Dining orders.

**Elevator Use:** Elevator buttons are frequently cleaned and disinfected; a surface application of an antimicrobial compound kills germs for up to six months. Capacities are limited to one family or party at a time, up to four people.

**Hygiene Kit:** Overnight hotel guests receive a complimentary hygiene kit featuring hand sanitizer, facial tissues, disinfecting wipes and spray.

**Transportation:** House car service is suspended. Complimentary shuttle service to the Ocean Club, Flagler Steakhouse, Henry’s Palm Beach and Echo is available. Shuttle seating allows for social distancing; vehicles are frequently cleaned and disinfected.

**V. CLEANING PRODUCTS & PROTOCOLS**

Prior to COVID-19, The Breakers employed extensive health, safety and hygiene measures that adhered to EPA Guidelines. These operational practices will continue and we are implementing additional systems and new technology for cleaning and disinfecting.

**Air Filtration Systems:** The cleaning frequency of our HVAC (heating, ventilation and air conditioning) systems has increased. A combination of ionization and UV-light technology to enhance air quality and disinfection is used.

**Cleaning Products:** A variety of EPA-approved, antimicrobial and surface disinfectants, which include hydrogen peroxide, alcohol and bleach-based solutions, are utilized. These cleaners meet CDC requirements for use against viruses (such as COVID-19), bacteria and other airborne and bloodborne pathogens. All handrails and elevator buttons receive an antimicrobial compound application, killing germs for up to six months. In addition, the use of electrostatic spray technology provides a superior disinfectant as appropriate.
Communal, Meeting & Public Spaces: The frequency of cleaning and disinfecting all public spaces has increased. There is an emphasis on high-traffic areas and key touch points, such as check-in desks, elevator landings, house phones, retail store counters and displays, meeting rooms, public restrooms, door handles, stair handrails, trash bins, ATMs, fitness equipment, restaurant entrances, dining surfaces and seating areas. The arrangement of furniture allows for social distancing.

Front Office & Guest Services: Glass partitions at service desks are frequently cleaned and disinfected. Room keys have a one-time use and are discarded upon every guest departure.

Guest Rooms: EPA approved cleaning products and disinfecting protocols are used in guest rooms with particular attention paid to high-touch items, such as doors, furniture handles and pulls, nightstands, toilet seats and handles, telephones, thermostats, light switches, alarm clocks, luggage racks, safe keypads, carpet and flooring.

The TV remote control is cleaned, disinfected and sealed prior to guest arrival. Newspapers are available upon request and recycled after each use. Housekeeping also discards paper menus and single-use collateral upon every guest departure.

Housekeeping: A guest can accept or decline daytime and evening housekeeping service, and they may adjust their preferences daily. To minimize contact with guests while cleaning, housekeepers are able to return at alternate times for occupied rooms. Should housekeeping day service or evening turndown be desired, housekeepers will wear a facial covering, gloves and protective shoe coverings. Two sets of disposable gloves are used per room, one for the bathroom and one for the bedroom area; they are immediately discarded thereafter. At the start and end of each shift, all carts and equipment are cleaned and disinfected.

Laundry: Bed linen and towels are changed based on guest preference. All items will continue to be washed at a high temperature and in accordance with CDC guidelines. After departure, all linens and towels are cleaned, whether they appear used or not.

Public Restrooms: All public restrooms are frequently cleaned and disinfected; we have temporarily replaced cloth hand towels with disposable paper hand towels.

Room Recovery Protocol: In the event of a presumptive case of COVID-19, the guest’s room will be removed from service and quarantined. The room will not be returned to service until the case has been cleared. In the event of a positive case, the room will remain out of service for the recommended time frame needed for the virus to die, and it will then be thoroughly cleaned and disinfected per CDC guidance. Prior to reactivation, a certified third party vendor sterilizes each room with a deep penetrating fog treatment that utilizes non-toxic, plant-based products that are safe, effective and environmentally friendly. The application of these hospital-grade,
EPA-registered, and CDC-approved products, kill 99.99% of all molds/fungi, bacteria, and viruses, including COVID-19.

VI. **HOTEL OPERATIONS**

**Activities:** The Playground and Sports Court are open; shared equipment is unavailable and guests must bring their own ball. The Playground is spot cleaned and disinfected throughout the day and receives a complete spray treatment to disinfect nightly. The Family Entertainment Center is temporarily closed; this includes the arcade, playroom, children’s camps and babysitting services.

**Business Center:** Shared computers for guest use are not available. Should printing services be needed, our Guest Relations Team is happy to assist.

**Guest Shipping:** For guest packages, our Mailroom Team calls each guest to confirm preferred delivery time. Packages are delivered to the room and placed outside the door. Our team will then knock and wait six feet away to ensure the package is retrieved.

**Ice Machines:** Self-service ice machines on guest floors are available. They are frequently cleaned and disinfected.

**Laundry & Dry Cleaning:** Services use social distancing pick-up and delivery.

**Ocean Fitness:** Between each use, fitness equipment is cleaned and disinfected; it is spaced accordingly to accommodate social distancing. Complimentary fitness classes, including water aerobics and cycling, are available for guests and members. Per Executive Order 2020-12, guests are not required to wear a facial covering when actively engaging in exercise and maintaining social distancing in accordance with CDC guidelines. Personal trainers are required to wear facial coverings and maintain social distancing during each session; they will disinfect mats and equipment for each client.

**Retail Shops:** Displayed signage reminds customers of facial covering requirements and appropriate social distancing practices throughout our boutiques. Reusable face masks are available for purchase at Lilly Pulitzer, News & Gourmet and Signature Shop. Glass partitions separate customers and cashiers at service counters when possible. Hand sanitizer is available in every store.

News & Gourmet features individually wrapped pastries. Utensils, condiments and straws are available upon request and are individually pre-packaged and sealed.

Make-up application services in our Guerlain boutique are suspended.
All shops are cleaned and disinfected nightly; frequently touched surfaces are disinfected throughout the day and upon a shift change.

**Salon & Spa Services:** Nail and salon services are available. Our staff and guests are required to wear facial coverings and employees will wear gloves as necessary. Spa facilities, including steam, sauna, lounges, locker rooms and treatment rooms, will reopen at a later date. At that time, capacities will be limited, treatment rooms will be cleaned and disinfected between each use, and all amenities will be displayed for single use. There will be no self-service refreshments. Attendants will provide individually portioned snacks and beverages.

**Vendors:** Every vendor who enters the property is subject to a temperature screening and is required to wear a facial covering. Any vendor with a temperature of 100.4°F or higher is denied access to the property.

**VII. CLUB OPERATIONS**

**Beach & Pool:** Pool seating is configured at a minimum of six feet apart, unless guests are family members. After each use, chaise lounge chairs are cleaned and disinfected using an accelerated hydrogen peroxide-based Oxivir mist application; staff is on duty to provide chair set up and towel and beverage service. Bungalows remain available for daily rental. They are cleaned and disinfected after each use. Beach & Pool employees maintain social distancing and wear facial coverings and gloves as appropriate. Limited water sports are available.

**Facilities:** The Clubhouse, fitness facilities, locker rooms and exterior restrooms are frequently cleaned and disinfected. On-course water stations remain available; complimentary water and Powerade are provided in each cart. Designated signage outlines the social distancing and facial covering mandates of the CDC Guidelines.

**Golf:** Available for club members and hotel guests only, tee times are limited to four per hour and players must arrive no earlier than 20 minutes prior to their tee time. The following policies apply:

- A maximum of one player may ride in a cart unless players live in the same household. Staff will confirm household verification by ID. Shared carts are marked with a small colored flag to identify verified family sharing.
  - Golf carts are cleaned and disinfected after each round.
  - Scorecards, pencils, tees and towels are issued upon request.
  - Sand and seed are offered to each golfer or removed if requested. Bottles and scoops are cleaned and disinfected between rounds.
  - Play is set-up for walking and is encouraged.
- Caddies are not permitted at this time.
- Practice facilities are only accessible to members and guests with booked tee times.
  - For warming-up, hitting bays are spaced 10 feet apart to accommodate social distancing guidelines. Use of these bays is limited to 20 minutes immediately prior to a player’s scheduled start.
  - Bag handling, storage and rental clubs are currently not available.
  - A refreshment station offers drinks, packaged snacks, golf balls and gloves for purchase.
  - Charges are automatically applied to the account on file; signature is not required.
  - During play, golfers are not permitted to rake bunkers or touch flag sticks. In addition:
    - Holes are filled for easy access to the ball.
    - The USGA suggests golfers play preferred lie in bunkers and to “rake” with their feet.
    - All ball washers have been removed or locked down.
    - Golfers should practice social distancing per the CDC Guidelines, a minimum of six feet apart.
  - Players should not congregate after play and they should leave the golf facility immediately upon completion of play.

**John Webster Golf Academy:** At this time, we are offering individual and small group lessons that comply with social distancing protocols; clinics and junior clinics are not available.

**Member Activities:** Social gatherings and club activities are postponed to avoid forums for club members congregating.

**Staff:** All staff are required to wear a facial covering and gloves as necessary. Employees are directed to wash hands or sanitize after touching any equipment, including clubs, bags or shoes.

**Tennis:** All tennis activities comply with social distancing protocols. Tennis courts are available for play and small group lessons. Clinics and junior clinics are currently not available. Booking times are staggered to create additional time between sessions and prevent congestion. Court gates are left open to avoid touching. Hand sanitizer is available at all main contact points. Posted signage reminds players of CDC guidelines. Complimentary water and Powerade is available on the tennis veranda in lieu of self-serve water stations.
VIII. FOOD & BEVERAGE

The Breakers had elevated food safety standards in place prior to COVID-19. We are one of only a few hotels in the United States with a dedicated Food Safety Manager. This position is held by a former experienced Food Safety Inspector for the State of Florida, who is now employed full-time to inspect all of our restaurant and banquet food production, safety and sanitation.

Our restaurants currently provide a la carte meals; buffets and self-serve stations are suspended.

Condiments and sugar options are served in single use containers (either disposable or washed after each use). Straws are available upon request and individually wrapped. After each use, menus, check presenters and pens are cleaned and disinfected.

We continue to follow the FDA’s Food Code recommendations for hand washing and disposable glove use in all food service areas.

**Food Safety:** We will continue to work with EcoLab and ServSafe to enhance our guidelines for hygiene and disinfecting, as well as provide training for all food service employees. A full-time, dedicated Food Safety Manager oversees all outlets; this individual completes daily food safety audits. All food handlers and supervisors are trained in safe food preparation and service practices. Food & Beverage Managers are required to conduct self-inspections using the company’s food safety standards as guidelines.

**In-Room Dining:** A single-use menu is available in every guest room and discarded upon guest departure. Guests may order by calling or texting; no-contact delivery is provided. Food is preset and either served with plate covers or sealed with tamper-proof stickers and placed outside of the guest room door for guest retrieval. Each cart includes a button that notifies the staff that the cart is ready for pick-up when pressed. After each use, buttons are cleaned and disinfected. Guests will place their cart in the hallway outside of their room for staff removal.

**Restaurants & Bars:** Restaurants and bars have reduced seating capacities in compliance with government mandates. Hosts and supervisors are managing social distancing at restaurant entries, while stationed behind glass partitions when possible. Additional partitions have been installed between booths where possible. Hand sanitizing stations are available at every restaurant.

Point of sale (POS) terminals are assigned to a single server when possible. Between users and before and after shifts, they are cleaned and disinfected. If multiple servers are assigned to a POS terminal, servers will sanitize their hands after each use. Dining tables, bar tops, stools and chairs are cleaned and disinfected after each use. Cocktail garnishes are prepared in advance and
bar snacks are served individually, not shared by the table. Menus are available online, are single use or are disinfected between customers.

Online ordering with curbside pick-up for dinner service at Echo, The Breakers off-site Asian restaurant, is available. Tamper-proof stickers will be applied on all to-go meals.

Retail Food Service: Our retail food venues, namely News & Gourmet and Mary Lily’s, follow the same protocols for hygiene in regards to food handling and service. High-touch/high-traffic areas are frequently cleaned and disinfected.

IX. MEETINGS & EVENTS

The Conference Services and Events team will coordinate and customize all details following CDC guidelines and government orders, which include maximum occupancy levels.

Banquets & Catering: We have redesigned our banquet menus and reimagined our food & beverage service. We are introducing individually packaged, fresh-food options; upscale box lunches and an expanded menu of plated selections; as well as “one-plate” meals (inclusive of appetizer, entree and dessert) to minimize human interaction. Modified menus showcase available service styles and food selections.

We have suspended all buffet and self-serve food options, with the exception of sealed beverages and individually packaged food items. Passed hors d’oeuvres and canapés are covered or individually packaged.

Stations with attendants and walk-up bars are available by mutual agreement of client and The Breakers, only if social distancing can be enforced using stanchions, floor markers and signage as appropriate. If a walk-up bar is not available, passed cocktail service will be provided. Glassware remains behind the bar and all cocktail garnishes are pre-skewered.

Staff will attend and serve coffee and all other meeting break refreshments. Individual cans of water replace shared water carafes and self-serve hydration stations.

Capacities and Floor Plans: To ensure social distancing, every event has customized floor plans and seating capacities.

Conference & Event Services: Meeting rooms are cleaned and disinfected after each group, with special attention paid to high touch points, such as door handles, tables, chairs and light switches. Single use notepads and pens are provided to attendees. Between events, equipment, linen and meeting amenities are cleaned and disinfected or replaced. All employees wear appropriate PPE.
Facial Coverings: Per Executive Order 2020-12, facial coverings must be worn by all guests when entering, exiting and moving throughout indoor, public common areas, including indoor meeting and event spaces. At catered banquet events, facial coverings need only to be worn when entering or exiting the event space, or when otherwise away from the table. Facial coverings do not need to be worn at outdoor meetings and events, unless social distancing, in accordance with CDC guidelines, is not possible or not being practiced. The resort will provide a limited quantity of complimentary, disposable masks for attendees if needed.

Hand Sanitizing Stations: Provided at each meeting or event for attendee use.

Signage: Displayed signage reminds attendees and guests of facial covering requirements, social distancing practices and other appropriate measures and advisories.

Social Distancing: Event entrance and exit for guests must be staggered. Dancing is permissible near and around the table where seated, only if six feet of social distancing is possible. Groups of 10 or more may not congregate in any public space that does not readily allow for appropriate social distancing.

Temperature Screenings: Complimentary temperature screenings for attendees are available upon request.

Vendors: See vendor requirements under Hotel Operations, Section (VI). Musicians must maintain six feet when performing.