Guidelines for Preventive Measures against COVID-19 in the Securities Industry

(Provisional Translation)

May 2020
Revised December 2020
Japan Securities Dealers Association

Introduction

These Guidelines have been formulated based upon the Japanese government’s “Basic Policies for Novel Coronavirus Disease Control” (published March 28, revised May 4; hereinafter referred to as “Basic Policies”)¹, which requested industry groups to take voluntary measures to contain the virus outbreak; for instance in the form of industry-specific guidelines that are compliant with the recommendations by the Expert Meeting on the Novel Coronavirus Disease Control². These Guidelines provide basic items of infection prevention measures against the Novel Coronavirus (COVID-19) based on the analysis and recommendations of said Expert Meeting, in order to serve as a reference for the business continuity of member firms, including operations within offices/stores and visits to customers.

Member firms are requested to have a good understanding of the intentions and details of the Basic Policies, and to endeavor to prevent the spread of COVID-19 in reference to the “Basic Considerations Regarding Infection Prevention” and “Specific Preventive Measures” outlined in these Guidelines, while taking into account the business structure and practical circumstances of each member firm.

These Guidelines should be applied not only during the period of the declaration of a state of emergency. Rather, even after the state of emergency has been lifted, until such time that the health and safety of all related parties can be sufficiently guaranteed—for instance, through a marked reduction of the risk of infection, establishment of a method of medical treatment from early diagnosis to prevention of exacerbation, as well as development of a vaccine—it would be recommended to continue to apply these Guidelines to the business activities of member firms, in consideration of the spread of infection and changes in social conditions.

These Guidelines have been prepared with reference to the recommendations of the Expert Meeting on the Novel Coronavirus Disease Control, and will be subject to revisions as appropriate based on the infection situation, views expressed by the experts, and amendments to the Basic Policies, etc.

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¹ For more information about the English translations of the Basic Policies, see https://www.mhlw.go.jp/stf/seisakunitsuite/bunya/newpage_00032.html
² Expert Meeting on the Novel Coronavirus Disease Control, “Analysis of the Response to the Novel Coronavirus (COVID-19) and Recommendations” (May 4, 2020). An English summary can be found here: https://www.mhlw.go.jp/content/10900000/000628610.pdf
Basic Considerations Regarding Infection Prevention

The financial and capital markets play a crucial role in the Japanese economy as a place where investors can manage their assets and corporates—including growth industries that pave the way for the next generation—can raise funds. As intermediaries in this process, securities firms are tasked with the responsibility of sustaining the continuous and stable functioning of Japan’s financial and capital markets to the greatest extent possible.

For member firms, it is imperative to recognize that efforts to prevent the spread of infections in the workplace will help to contain the spread of the virus in society as a whole, as well as contribute to the continuous and stable functioning of the financial and capital markets. In this vein, it is important to establish an appropriate capacity for prevention, evaluate the risk of infection according to the specific characteristics of each workplace, and take measures accordingly.

In particular, in addition to preventing the spread of infection to employees by, for instance, giving due consideration to commuting styles, establishing thorough preventive measures applicable at the individual level, and enhancing measures applicable to the workplace environment, it is imperative to endeavor to prevent the spread of the infection to customers as well.
Specific Preventive Measures

(1) **System for Preventing Infections**
   - Led by top management, establish a system under which measures to prevent the spread of COVID-19 are formulated and modified.
   - Continuously collect accurate information on COVID-19 through various channels, including the national/local government and the Japan Securities Dealers Association.

(2) **Ensuring Health**
   - Encourage employees to check their temperature prior to their arrival at the office, as well as whether they are exhibiting symptoms indicative of COVID-19. Also, encourage employees who are not feeling well to take various types of workplace leave. Additionally, for those who fall ill during work, send them home immediately to wait until further notice, as necessary.
   - For employees who are resting at home due to exhibiting symptoms such as a fever, request that they check their health every day. When they are no longer exhibiting symptoms, in making the decision to return to the office, refer to the guidelines of academic societies\(^4\). If symptoms persist, request said employee to consult a doctor or public health center specialist.
   - The above shall be applied in the same way to dispatched/contracted workers through their dispatching/contracting agencies.

(3) **Commuting**
   - To alleviate crowds in public transportation systems, make available a variety of work styles, including teleworking (work from home or at a satellite office), flexible/modified work hours, and rotating shift work (i.e. dividing work days or time increments within a work day among the workforce).

(4) **Workplace**
   - Implement changes to the office layout such that a certain distance (ensure, as much as possible, about 2 meters (at least 1 meter); the same applies hereinafter) is maintained between employees who are face-to-face with one another; for instance, by spacing out the seating layout, avoiding face-to-face seating arrangements without partitions, using a zigzag-style seating arrangement, or seating people adjacent to one another.
   - Ensure that employees are washing their hands regularly, including when they begin their work and after their break time. For that purpose, place hand soap dispensers at all facilities with running water. At spaces where running water facilities (sinks) are not available, place hand sanitizers.

\(^4\) For example, the “Guidelines for Preventive Measures against COVID-19” released by the Japanese Society of Travel and Health and Japan Society for Occupational Health (available in Japanese only):
- Ensure that employees endeavor to wear face masks at all times during work. However, in cases where sufficient distance between people has been secured, it is possible for employees to take off their face masks as appropriate in accordance with the situation.

- Ensure sufficient ventilation in the office space, or the building as a whole. To improve ventilation, in the case where windows are opened, ensure that they are opened at least twice every hour (frequently in the wintertime). In the case that air purifiers are used, there is no need to also open windows for extra ventilation. It is also conceivable to use a CO₂ monitor or other such tools to check the effectiveness of the ventilation interventions.

- Ensure that the humidity level within the office is set at 40% to 70% through the use of air conditioners and humidifiers as appropriate, based on the Ordinance on Health Standards in the Office. Stay aware and conscious of the fact that sufficient humidity in wintertime is thought to be effective for preventing the spread of the disease.

- Minimize the number of items that are shared with others or frequently touched by multiple people.

- Consider creating barriers to physical contact by placing acrylic boards or transparent vinyl curtains in areas where employees and customers frequently meet and where it is not possible to ensure that face masks are worn by the related parties. Moreover, when using transparent vinyl curtains, etc., be cautious of the following regarding fire prevention and safety:
  1. In principle, do not place these near equipment/appliances that use fire, incandescent light bulbs, or other potential sources of heat. However, if, for infection prevention purposes it is deemed necessary to place them near such items, use non-flammable materials such as flame-resistant, incombustible, or flameproof products.
  2. If the same material is used, it is better to use boards (acrylic boards), rather than the thin film-type curtains, from the perspective of fire prevention.
  3. If there are any questions, consult the nearest fire department.

- When working outside of the office, endeavor to evade crowds by avoiding the use of public transportation during rush hours.

- When meeting with customers outside of the office, such as visits to customers at their homes, implement measures such as maintaining a certain distance from the customer and wearing a face mask.

- When traveling, pay attention to the current status of the spread of the virus in the area, as well as the infection prevention measures in place at the destination.

- Document details of visits/travels such as contacted persons, meeting times, traveling routes and meeting venues.
Consider hosting meetings, events, seminars, lectures, etc. (hereinafter referred to as “Events”) online, wherever possible.

In the event that Events are hosted face-to-face, ensure proper precautions are taken such as ensuring enough ventilation and wearing a face mask. Moreover, work to minimize proximity between participants and avoid face-to-face seating by, for example, reducing the number of chairs or marking desks for where to sit.

With regard to external Events, check the infection prevention measures carefully, only send the bare minimum number of employees, and ensure they all wear face masks.

When teleworking, refer to the guidelines released by the Ministry of Health, Labor and Welfare\(^5\), and pay due care to ensuring a system by which work hours can be appropriately grasped and a proper working environment is observed.

**Break Rooms, Restrooms, Office Equipment**

- In break rooms, ensure that shared items (such as chairs and tables) are hygienically maintained (through, for example, disinfection) and that employees are washing their hands when entering/leaving the room. Also, ensure that there is a certain distance between people within the space, and limit the number of people who enter the room at a time, to thoroughly prevent the so-called three Cs (closed spaces with poor ventilation, crowded places with many people nearby, and close-contact settings such as close-range conversations). Even in instances where, due to facility restrictions, implementing the above is deemed difficult, make sure that people are not sitting face-to-face.

- Ensure appropriate management of restrooms, such as prohibiting the use of shared towels at the restroom sink or limiting the use of hand dryers.
  
  * To disinfect the office equipment, use the antiseptic most appropriate for each equipment, such as sodium hypochlorite fluid and ethanol (refer to the Appendix, attached)

- Ensure that doorknobs, light switches, trashcans, and other shared office equipment are hygienically maintained (through, for example, disinfection).

- Appropriately manage and throw out trash, and ensure that employees handling said trash are taking measures for personal hygiene such as wearing a face mask and gloves, and/or washing their hands.

**Visitors**

- Limit the number of external parties such as business counterparties visiting the office to those deemed necessary, and make a record of all visitors.

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\(^5\) Refer to the MHLW’s guidelines (Japanese only) on appropriate management of teleworking: [https://www.mhlw.go.jp/content/000553510.pdf](https://www.mhlw.go.jp/content/000553510.pdf)
(7) Request for Cooperation from Customers

- Ask customers who are exhibiting cold-like symptoms, who have a fever, or who have been in Close Contact* to refrain from coming to the store.

*Close Contact above refers to the case that they: i) have been in close contact with patients tested positive for COVID-19, ii) have traveled to a country/region subject to travel restrictions or where a period of self-isolation was required within the last 14 days; or iii) have been in close contact with a resident of such country/region within the last 14 days.

"Persons in close contact" refers to the individuals with whom patients (confirmed patients, including “asymptomatic carriers” (those who do not present with clinical characteristics but are diagnosed with the novel coronavirus infection by test); the same applies hereinafter) have been in physical contact during the potential infection period(Note), to whom the following applies:

- Those who have lived with or had prolonged contact (including contact inside a car, plane, etc.) with a person who is confirmed to have the novel coronavirus infection;
- Those who have consulted/examined, nursed, or cared for a patient who has the novel coronavirus infection (confirmed), without appropriate protection against infection;
- Those who are likely to have directly touched contaminants such as respiratory tract secretions or body fluids of a person who has the novel coronavirus infection;
- Any person who has been in physical contact with a patient (confirmed patient) for more than 15 minutes without taking the necessary infection prevention measures, at a distance such that they could touch him/her with their hand (1 meter, as a rough guide) (How contagious the patient is will be comprehensively assessed based on each situation including the surrounding environment and nature of the contact).

(Note)

- “Potential infection period of patients (confirmed patients)” refers to the period between two days before the date when the patients experience symptoms thought to be indicative of COVID-19 (see below) including fevers and/or respiratory symptoms (coughs, difficulty breathing, etc.) and the start of hospitalization/quarantine at home or in a facility.
- “Potential infection period of asymptomatic carriers” refers to the period between two days before the positive test results confirming that the said individual has been infected and the start of hospitalization/quarantine at home or in a facility.
Ref.: Guidelines for Active Epidemiological Investigation in Patients with Novel Coronavirus Infection (Infectious Disease Surveillance Center, National Institute of Infectious Disease (May 29, 2020))

- Take measures such as reducing the number of chairs in the store or receiving store visits on a reservation basis only, to ensure that certain distance between customers is maintained. Request cooperation from customers to this effect.
- Ask customers to wear face masks when entering the store.
- Disseminate relevant information such as information about store closures, changes in business hours, changes in business hours at call centers, etc.
- Notify customers ahead of time that there may be a waiting time prior to the entry depending on the congestion of the store.
- Ensure that customers are informed of the company’s policies with respect to the abovementioned items and the company’s overall response to COVID-19 by making this information available online on the company website and/or as storefront posters.

(8) Education of Employees regarding Prevention of Infection

- Encourage employees to understand the importance of infection control measures and promote changes in their behaviors including in their daily lives. Disseminate information relevant to this end, such as the “Example of Practicing ‘New Lifestyle’” released by the Expert Meeting on the Novel Coronavirus Disease Control.
- Encourage employees to use the COVID-19 Contact-Confirming Application (COCOA). For employees who receive a notification of close contact through COCOA, encourage self-quarantine until the results of the test are available.
- For employees who use public facilities such as public transportation and libraries, ensure that they wear a face mask, observe proper etiquette when coughing, and refrain from talking in closed spaces such as in a car.
- Respect the human rights of patients, infected persons, medical personnel, and returnees to Japan, as well as those of their families and children.
- Ensure that employees and related personnel that have recovered from COVID-19 are not discriminated against in the workplace, and can smoothly return to work by giving due consideration to said employees as well as educating the other employees to this effect.
- In the event that an employee is feeling unwell, including when said individual experiences

6 https://www.mhlw.go.jp/content/10900000/000632485.pdf
symptoms other than those thought to be possible signs of COVID-19 (e.g. fevers, problems in sense of smell or taste, etc.), or when his/her family has been infected with COVID-19, or when there is the possibility that said individual has come in close contact with a person with COVID-19, encourage the use of various types of workplace leave or teleworking.

- In the event that an employee is a person in close contact (see above for details), instruct him/her to stay at home until further notice.

(9) **Response in the Event an Infection is Confirmed**

a. *When an infection has been confirmed for an employee of a member firm*

- Follow the instructions of the public health center and medical institutions.
- Based on the movements of the infected person, take such measures as disinfecting the place of work of the said individual (refer to the Appendix, attached), as well as instruct employees who have been in close contact with said individual to stay at home until further notice.
- Respect the human rights of the infected person and ensure that the name of the infected individual cannot be identified. Regarding the handling of personal data for the purpose of the prevention of spread of COVID-19, respond appropriately with due consideration of the protection of personal information.7
- With respect to whether to disclose when an infected person has been confirmed within a member firm, as well as the method of such disclosure, with consideration of the protection of personal information as described above and taking into account the necessities from the standpoint of public health, examine the response in light of the actual situation.

b. *When an infection is confirmed for an employee of another company whose office space is shared with a member firm (e.g. in the same building)*

- Follow the instructions of public health centers and medical institutions, and respond in cooperation with the owner of the building.

(10) Other

- General health and safety managers should be aware of and make note of the contact details of the local public health centers, and cooperate with inquiries and other activities conducted by the public health centers.

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Workplace Disinfection

Basic Considerations Regarding Disinfection in the Workplace

- Before disinfection, use a neutral detergent to clean the surface.
- Use alcohol disinfectant (60%-95%) or sodium hypochlorite (0.05%).
- Use sodium hypochlorite (0.1%) for disinfecting toilets.
- Basic method for disinfection is to clean by wiping (as opposed to spraying disinfectant into the space).
- Use appropriate personal protective equipment (PPE) (i.e., masks, gloves, gowns, etc.).

(1) Disinfection under Normal Circumstances

- Regularly disinfect door knobs, handrails, elevator buttons, etc. that are touched by the general public.
- Regularly disinfect toilets (including the floor) that are used by the general public.
- Disinfect at least once a day (preferably multiple times).
- Each employee disinfecting his/her own table, chair, computer, telephone, etc. prior to leaving the office is desirable.

(2) Disinfection in the Event Infection is Identified

- Follow the instructions from the public health center and take measures to disinfect the workplace under the responsibility of the operator.
- If there are no instructions from the public health center, disinfect the workplace using the following as reference:
  - Spaces and objects subject to disinfection are those used within 3 days after their last use by the infected person.
  - Conduct adequate ventilation before disinfection. Moreover, the time required for ventilation differs depending on the organization producing the recommendations, i.e.:
    - The European CDC recommends a minimum of 1 hour ventilation before disinfection.
The US CDC recommends approximately 24 hours of ventilation before disinfection.

- Disinfect the relevant areas.

The following serves as a guide for possible areas subject to disinfection:

- Spaces where an infected person has worked (including desks, chairs, etc., with a radius of at least 2m)
- Toilets, smoking rooms, break rooms, dining halls, etc. which the person has used