

Apple Inc.

WORKPLACE VIOLENCE PREVENTION PLAN

Effective Date: July 1, 2024

INTRODUCTION

At Apple, workplace safety is paramount and the well-being of our employees is a top priority. Apple's Workplace Violence Prevention Plan ("WVPP" or "The Plan") outlines our commitment to proactively address the risks associated with workplace violence and sets forth the guidelines and procedures to prevent and respond to such incidents.

We encourage all employees to familiarize themselves with the Plan, participate in the required workplace violence prevention training, and actively contribute to our shared responsibility for workplace safety.

The Plan will be reviewed on an annual basis, at a minimum, and in connection with any incident or specific concern and revised as appropriate. For any questions or concerns about the Plan, please feel free to reach out to WVPlan@group.apple.com. Workplace safety will always be a top priority, and together, we can keep our workplace environment safe and secure for everyone.

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I. WHO IS RESPONSIBLE FOR IMPLEMENTING THE PLAN

Responsible Parties

This section outlines the roles and responsibilities of the individuals entrusted with overseeing and implementing the Plan.

1. WVPP Leadership Team

The WVPP Leadership Team includes representatives from our Global Security, Environment Health & Safety, Employee Relations, People, and Legal departments. Their responsibilities include:

- Setting the cross-functional strategy for workplace violence prevention across Apple's lines of business;
- Ensuring adequate resources, including funding, personnel, and training, to support the Plan;
- Formulating and maintaining policies that align with the Plan's objectives and approving any major changes to the Plan.

WVPP Cross-functional Leadership Team Member Position Titles:

Global Security Crisis Management

Senior Manager

Global Threats Team Manager

Corporate Security Manager

Legal Global Security

Senior Employment Counsel

Employee Relations

Employee Relations Leader

Employee Relations Business Partner

Environment Health & Safety

Environment Health & Safety Manager

Environment Health & Safety Senior Counsel

Training

Global Training Project Manager

- **2. Administration**

WVPP Cross-functional Leadership Team will be the Plan Administrators.

Global Security's Global Threats and Crisis Management team will provide functional organization of the cross-functional team.

Including:

- Overseeing the team responsible for tracking the reporting, investigation, and resolution of workplace violence incidents, including maintaining the violent incident log and issuing specific violent incident logs or other records Global Security maintains in response to employees and Cal OSHA;

- Overseeing the team responsible for tracking security inspections and hazard assessments at Apple worksites in California;
- Collaborating with the WVPP Cross-functional Leadership Team on the Plan and associated training materials updates as needed;
- Collaborating with the WVPP Cross-functional Leadership Team to issue WVPP training to all relevant people;
- Collaborating with legal representatives to ensure compliance with all applicable legal requirements.

In addition, all managers and supervisors are responsible for overseeing adherence to the Plan at their worksites. They are also responsible for promptly reporting any workplace violence incidents through the reporting channels described in Section III below.

II. DEFINITIONS OF WORKPLACE VIOLENCE

This section outlines the legal definitions for workplace violence as well as other terms used in the Plan. In short, workplace violence is any act of violence or threat of violence that occurs in a place of employment.

Under California law, workplace violence includes, but is not limited to, the following:

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving the threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

A “threat of violence” means any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose

California law further defines workplace violence as falling into four distinct categories:

- Type 1 violence is workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.
- Type 2 violence is workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
- Type 3 violence is workplace violence against an employee by a present or former employee, supervisor, or manager.
- Type 4 violence is workplace violence committed in the workplace by a person who does not work there but has, or is known to have had, a personal relationship with an employee.

“Emergency” means unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

“Log” means the violent incident log required by California Labor Code Section 6401.9.

“Plan” means the workplace violence prevention plan required by California Labor Code Section 6401.9.

It is important to note that the definition of workplace violence does not include lawful acts of self-defense or defense of others.

III. ACTIVE INVOLVEMENT OF EMPLOYEES IN DEVELOPING AND IMPLEMENTING THE PLAN

This section outlines the procedures to ensure the active participation of our employees (and, where applicable, authorized employee representatives) in the development and implementation of the Plan. By fostering a culture of open communication, collaboration, and shared responsibility, we aim to create a workplace where everyone actively contributes to the prevention of workplace violence.

1. Identification and Evaluation of Hazards:

We encourage the active involvement of our employees in the identification and evaluation of potential workplace violence hazards by providing multiple channels for employees to communicate their concerns or observations regarding potential hazards. Employees may make such reports to their manager, the People Team, EHS, or Global Security.

Additional information on how to report concerns can be found at:

People Team: [Info on Reporting a Concern](#), [Report a Concern to People Team](#), [Apple Open Communication Link for Workplace Concerns](#)

Environment Health and Safety: [EHS Safety Report Incident, Near Miss or Observation](#)

Global Security Operations Center: 1-408-974-3333

2. Design and Implementation of Plan and Training:

To ensure that our Plan is as effective as possible, we have conducted in-person and virtual employee engagement and feedback sessions to discuss strategies for workplace violence prevention at Apple worksites throughout California. We also encourage employees to provide input and feedback on training content and methods by encouraging them to reach out to WPlan@apple.com. Employee feedback will be reviewed and incorporated into the Plan and our training materials and methods as appropriate.

3. Reporting and Investigating Incidents:

Employees are also instructed to report all incidents of workplace violence promptly and are assured that retaliation for such reporting is strictly prohibited. Employees are required to participate in incident investigations and to provide all relevant information in order to ensure our investigations are as thorough and effective as possible (see Section VI below).

4. WVPP Review:

Employee input will also be sought during the periodic review of the Plan, whether on an annual basis or in connection with any specific incident that may occur (see Section XII below).

IV. COORDINATION WITH THIRD PARTY EMPLOYERS

This section outlines the procedures in place to coordinate implementation of the Plan with third party employers who have employees or workers at Apple worksites in California (“Third Party Employers”).

Apple will coordinate with Third Party Employers that have workers on Apple sites, when applicable, to confirm that those employers and employees understand their respective roles and work together, where appropriate, to investigate and/or support an investigation into any workplace violence incident that occurs on an Apple site. Apple will further coordinate with Third Party Employers, when applicable, to confirm that workplace incidents are being reported and recorded and workers are trained as required by law. Apple will coordinate with Third Party Employers, when applicable, in a variety of ways, including but not limited to addressing expectations, requirements and responsibilities as set forth in the contractual agreements with these other employers.

If we receive a report of workplace violence from a Third Party Employer’s employee, where appropriate, Apple will collaborate with the Third Party Employer to ensure a comprehensive, thorough, and impartial investigation. Apple will also work with Third Party Employers to confirm that they must maintain a violent incident log for any workplace violence incidences at Apple worksites, and that they must provide a copy of that violent incident log when requested.

Our commitment is to provide a safe and secure environment for all workers and to partner with Third Party Employers in pursuit of this shared goal.

V. EMERGENCY RESPONSE PROCEDURES

This section outlines our procedures to respond to actual or potential workplace violence emergencies, ensuring the swift and appropriate action needed to protect our employees, onsite vendors, contractors, and others who may be on Apple premises.

1. Life-Threatening Emergencies: In the event of a life-threatening emergency, all employees are instructed to remove themselves from danger and call 9-1-1. Once safe, employees should contact Global Security at 408-974-3333 as soon as possible. That number can be found on every employee’s badge and is staffed 24/7.

2. Global Security and the Global Threats Team (GTT): Global Security and the Global Threats Team are responsible for working with the People Team and others in investigating reports of workplace violence incidents and are equipped with the knowledge and skills necessary to collaborate and mitigate such incidents. In certain locations, additional security personnel are present and trained to respond and assist employees as well.

3. Apple Emergency Alerts: The [Apple Emergency Alerts \(AEA\)](#) program is an alert system that enables the rapid notification of all employees in the event of a workplace violence emergency. Employees should sign up to received notifications in Apple Directory.

4. Environment Health & Safety: We maintain comprehensive evacuation and sheltering plans that are tailored to the specific characteristics of each worksite and are posted at each Apple location. These plans include designated evacuation routes, assembly areas, and procedures for employees to follow during an evacuation. In situations where evacuation may not be feasible or safe, we have established sheltering plans that provide employees with guidance on taking cover and seeking safety within the worksite.

More information about evacuation and sheltering in place can be found here: [Apple Evacuate or Shelter in Place](#)

5. Employee Emergency Response Training: All employees will receive mandatory training on how to respond to workplace violence emergencies. This training covers how to best react in an emergency, whom to contact, use of the alert system and other important information to protect employees' safety. In addition, regular drills are conducted to test policies, procedures, coordination, communication, decision making, and responses to workplace violence.

REPORTING, RESPONSE AND INVESTIGATION PROCEDURES AND PROHIBITION OF RETALIATION

This section outlines the procedures in place to report and respond to workplace violence incidents and to ensure that employees are protected from any form of retaliation. By maintaining these procedures, we aim to create an environment where employees feel safe and empowered to report incidents and confident that they will be protected from any adverse consequences for doing so.

1. Reporting Procedures:

Our processes for life-threatening emergencies are described in Section V above.

Any employee who witnesses or experiences an incident or threat of workplace violence or identifies a potential workplace hazard related to workplace violence should report it as soon as possible. Reports may be made to supervisors, managers, the People Team or Global Security. Supervisors, managers and the People Team should in turn immediately report any such incidents or threats to Global Security.

2. Post-Incident Response to Reports:

Upon receipt of a report, addressing the safety and well-being of individuals involved in a workplace violence incident are our top priorities. A preliminary assessment of the incident is conducted by the People Team to gather essential information and determine the appropriate course of action for further investigation, including involving relevant personnel and outside agencies.

The People team are trained to effectively handle WPV matters and work in collaboration with other teams and law enforcement, as necessary.

3. Investigation Process:

A thorough and impartial investigation is conducted including (1) gathering all relevant information (which could include photographic or other physical evidence and inspection and collection of data or Apple-owned devices), (2) interviewing involved parties such as employees, witnesses, law enforcement

or security personnel, (3) assessing the site for security risk factors associated with the incident; and (4) documenting the findings.

Employees who have reported a workplace violence incident are informed of the status and progress of the investigation. Confidentiality is maintained to the fullest extent possible to protect the privacy of all parties involved during and after the investigation process.

4. Prohibition of Retaliation:

We strictly prohibit any form of retaliation (an adverse employment action) against any employee who makes a report of workplace violence in good faith. Appropriate remedial action is taken against any individual who participates in an act of retaliation. Further, we provide training to all employees to ensure they are aware of our non-retaliation policy and understand how to report any concerns of retaliation.

5. Remedial Actions:

Based on the investigation findings, appropriate corrective actions are implemented to address the incident's causes and prevent recurrence. These actions may include disciplinary measures (in the case of Type 3 violence by a current employee), policy changes, or security enhancements

Further, we are committed to providing support to victims of workplace violence, including providing access to counseling and other resources.

6. Reporting and Record-Keeping:

All workplace violence reports, investigations, and related actions will be documented appropriately. Further, a violent incident log will be maintained as described more fully in Section XIII below.

VI. ENSURING EMPLOYEE COMPLIANCE WITH THE PLAN

The section outlines our procedures to ensure that all supervisory and non-supervisory employees comply with our Plan.

1. Training: All California employees, including supervisory and non-supervisory personnel, will receive annual training that covers the Plan's provisions, objectives, and the specific roles and responsibilities of employees in preventing and responding to workplace violence (See Section IX.).

2. Supervisors'/Managers' Responsibility: Supervisors and managers have oversight responsibility for their teams' adherence to the expectations set forth in the Plan.

3. Required Reporting: All employees are required to promptly report any incidents of workplace violence or potential hazards as described in Section V above.

4. Accountability and Consequences: All employees will be held accountable for adhering to the provisions of the Plan and complying with Apple's policy against workplace violence. Failure to comply with the Plan or Apple's policy may result in disciplinary action as described in Apple's policies on Misconduct and Discipline (which explicitly cover safety and violence violations). [Apple Policy Violation & Misconduct](#)

VII. COMMUNICATION WITH EMPLOYEES

This section outlines our procedures to inform employees about workplace violence matters and encourage them to maintain open, two-way communication about any issues that may arise.

1. Employees have been trained upon establishment of the Plan and will be trained on an annual basis as described in Section IX. Training will also assigned to new employees upon hire.
2. In addition to encouraging employees to come forward with any concerns relating to workplace violence and to promptly report threats or incidents, employees who have made such reports will be informed of the status of the investigations and whether remedial action has been taken (taking into account the privacy considerations of all involved).
3. We also encourage employees to provide feedback on our training and the Plan to reach out to our subject matter experts on the Plan to engage in a dialogue about the Plan at any time to WPlan@apple.com.

VIII. DEVELOPING AND PROVIDING WORKPLACE VIOLENCE PREVENTION TRAINING

This section outlines our training program which is designed to equip employees with the knowledge and skills necessary to recognize, respond to, and prevent workplace violence. All California supervisory and non-supervisory employees will be required to complete workplace violence training as detailed below.

- 1. Training Program Development:** Our training module includes, but is not limited to, educating employees on definitions of workplace violence, procedures for reporting workplace violence incidents or concerns without fear of reprisal, identifying potential workplace violence hazards, unsafe condition and unsafe work practices strategies for avoiding potential harm, how to obtain a copy of the Plan at no cost as well as a copy of the violent incident log and hazard assessments, how to contribute to the development and implementation of the Plan and associated training, and how to take advantage of opportunities for further engagement with a resource knowledgeable about the Plan. We tailor our training to reflect the unique characteristics of our businesses and worksites and to communicate effectively to our employees in terms of content and language.
- 2. Training Delivery:** Training has been provided to all employees upon Plan implementation and will be repeated annually, ensuring that all employees remain informed and up-to-date on workplace violence prevention measures. Training will also be assigned to all new California-based employees upon hire. Training is provided through interactive on-line, self-paced modules. Learners will be presented with case studies and scenario-based exercises to promote engagement and understanding. When material changes to the Plan occur or when a new workplace hazard has been identified, supplemental training on those updates will be provided.
- 3. Continuous Improvement:** We actively seek feedback from employees regarding the training program's effectiveness and relevance. Suggestions for improvements will be requested at the conclusion of all trainings and responses will be considered for ongoing enhancements to the training content and delivery.

IX. IDENTIFYING AND EVALUATING WORKPLACE VIOLENCE HAZARDS

This section outlines our comprehensive approach to identifying and evaluating workplace violence hazards.

- 1. Scheduled Periodic Inspections:**

Annual site surveys are conducted to ensure that any workplace violence hazards are continuously monitored and addressed. Assessments will also be conducted if we are made aware of any new or previously unrecognized hazard.

2. Hazard Identification and Evaluation: Identified hazards are thoroughly assessed by Global Security/EHS and/or other appropriate Apple team to determine their severity and potential impact on employee safety. This assessment includes the classification of hazards, their potential consequences, and strategies for mitigation.

3. Post-incident Review: Following any workplace violence incident, regardless of its severity, an immediate post-incident review is conducted to assess the factors that contributed to the incident. This includes examining both physical conditions and work practices.

4. Employee Reports and Concerns: As stated previously, employees are encouraged to report any workplace violence concerns or hazards they observe promptly, whether to a manager or supervisor, the People Team or Global Security. Apple also maintains several channels for employees to raise anonymous concerns, all of which are described on the People site. A review will be conducted of any reports made of potential hazards.

5. Documentation: Records of site surveys, hazard assessments, and corrective actions are maintained.

X. CORRECTING WORKPLACE VIOLENCE HAZARDS

This section outlines our procedures to promptly address and correct any workplace violence hazards.

1. Prompt Corrective Action: Upon the identification of a workplace violence hazard, action is taken to address or mitigate the hazard. The severity and potential consequences of the hazard guide the urgency of the response. Those deemed high-priority or posing an imminent threat are addressed with the utmost urgency and priority. We also closely monitor the progress of corrective actions to ensure that they are executed within established timelines.

2. Corrective Measures: Whenever possible, hazards will be eliminated entirely. This may involve modifying physical facilities, implementing policy changes, enhancing or otherwise revising site security, or altering work practices to remove the identified risk. In situations where immediate hazard elimination is not feasible, temporary controls are implemented to minimize the risk and protect employee safety. Interim procedures are established to ensure that employees can continue to work safely while long-term corrective actions are being planned and implemented.

3. Documentation: Records of identified hazards and corrective actions taken will be maintained.

XI. REVIEWING AND REVISING THE WORKPLACE VIOLENCE PREVENTION PLAN

This section outlines our procedures for reviewing and revising the Plan to ensure that is continuously evolving and improving.

1. Regular Review: The Plan will be reviewed at least annually by the WVPP Administrator and cross-functional partners. The Plan will also be reviewed when any deficiency in the Plan is observed or becomes apparent, and as otherwise needed to assess its effectiveness and relevance. These regular

reviews, which will include review of the Violent Incident Logs described in Section XIII below, ensure that the Plan remains up-to-date and aligned with current workplace conditions and potential hazards.

2. Post-Incident Review: Additionally, following any workplace violence incident, Apple’s established After Action Review (AAR) process will be initiated. During the AAR process, the Plan will be assessed for its effectiveness in identifying, preventing, and responding to workplace violence hazards and incidents.

This will include a comprehensive review of the incident and an assessment of whether any modifications to the Plan are necessary. If any gaps or areas for improvement are identified during in the AAR, revisions to the Plan will be made promptly to address these issues. These revisions may involve changes to policies, procedures, training, or other elements of the Plan.

3. Employee Involvement: As stated above, employees will be actively involved in the Plan review process. In addition to collecting employee insights, concerns, and feedback through our email communication channel (WPlan@apple.com) throughout the year, in person employee engagement sessions will continue to be held on the subject of workplace violence prevention. This feedback will be considered during the annual review and any other reviews.

4. Access to the Plan: The Plan, including any revisions, will remain available to employees on the [Global Security Resources page](#). Any updates or revisions will be included in our employee training on workplace violence prevention.

XII. RECORDING INCIDENTS IN THE VIOLENT INCIDENT LOG

This section outlines our procedures for recording and maintaining a Violent Incident Log (“Log”) that captures information about each instance of workplace violence, as defined in Section II above, in accordance with California Labor Code Section 6401.9(d).

1. Incident Documentation: The Log will include the information gathered from various sources during our investigation for each incident and will include:

- The date, time, and location of the incident.
- The workplace violence type or types, as described in Section II above.
- A description of the incident.
- A classification of who committed the violence, such as whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.
- A classification of circumstances at the time of the incident, such as whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
- A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
- The type of incident, including, but not limited to, whether it involved any of the following:

- (i) Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - (ii) Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - (iii) Threat of physical force or threat of the use of a weapon or other object.
 - (iv) Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - (v) Animal attack.
 - (vi) Other.
- Consequences of the incident, including, but not limited to:
 - (i) Whether security or law enforcement was contacted and their response.
 - (ii) Whether appropriate actions were taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
 - Information about the person completing the Log, including their name, job title, and the date when the Log was completed.

2. Protecting Personal Identifying Information: Privacy is one of our core values at Apple and we are committed to ensuring the privacy of all current and former employees. It is also our intention to treat incidents of workplace violence with the utmost care. To protect the privacy of individuals involved in a violent incident, personal identifying information that could reveal a person's identity, such as their name, address, electronic mail address, and telephone number will be omitted from the Log. Further, prior to any disclosure of the Log, additional information may be redacted if it tends to reveal the identities of the people involved.

XIII. MAINTENANCE OF RECORDS AND REQUESTING OF RECORDS

This section outlines our record-keeping procedures and the process by which employees may request access to certain records maintained in connection with the Plan.

1. Records and Retention Periods

- Records related to the identification, evaluation, and correction of workplace violence hazards will be maintained for a minimum of five years.
- Violent incident logs will be maintained for a minimum of five years.
- Records of workplace violence incident investigations will be maintained for a minimum of five years. Per applicable law, these records will not contain employee medical information.
- Training records, including but not limited to training dates, training content, information regarding training facilitators, if applicable, and the names and job titles of all attendees, will be maintained for a minimum of one year.

2. Accessibility of Records:

- All records required by California Labor Code Section 6401.9(f) will be made available to Cal/OSHA upon request for examination and copying.
- Upon request, employees may receive, without cost, copies of records of the Plan, the identification, evaluation, and correction of workplace violence hazards, training records, and violent incident logs for their worksite within 15 calendar days of a request.
- To make a request for records, employees should contact wplan@apple.com