WORKPLACE VIOLENCE PREVENTION PROGRAM for Amazon

Our establishment's Workplace Violence Prevention Plan (WPVP) addresses the hazards known to be associated with the four types of workplace violence as defined by <u>Labor Code (LC) section</u> 6401.9.

Date of Last Review: July 1, 2024

Date of Last Revision(s): N/A

DEFINITIONS

Emergency - Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

Engineering controls - An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee and the hazard.

Log - The violent incident log required by LC section 6401.9.

Plan - The workplace violence prevention plan required by LC section 6401.9.

Serious injury or illness - Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.

Threat of violence - 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.

Workplace violence - Any act of violence or threat of violence that occurs in a place of employment.

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 a 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.
- The following four workplace violence types:

Type 1 violence - 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 employees with the intent to commit a crime.

Type 2 violence - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

Type 3 violence - Workplace violence against an employee by a present or former employee, supervisor, or manager.

Type 4 violence - 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.

Workplace violence does not include lawful acts of self-defense or defense of others.

Work practice controls - Procedures and rules which are used to effectively reduce workplace violence hazards.

RESPONSIBILITY

The WPVP administrators referenced below have the authority and responsibility for implementing the provisions of this plan for Amazon.

Responsible Persons	Job Title/Position	Email
Business Assurance Center	Security Operations Center	acs@amazon.com
Joe Desmarais	Regional Security Manager	jodesma@amazon.com
Chris Huenke	Global Manager, TRNG, CXTAP & REG	huenke@amazon.com

EMPLOYEE ACTIVE INVOLVEMENT

Amazon ensures the following policies and procedures to obtain the active involvement of employees in developing and implementing the plan:

- Management will work with and allow employees to participate in:
 - o Identifying, evaluating, and determining corrective measures to prevent workplace violence.

Amazonians are encouraged to report workplace violence related incidents, concerns, hazards, or questions to the Corporate Workplace Incident Management (WIM) team. Corporate WIM will discuss, and where appropriate, incorporate Amazonian feedback into existing policies and procedures addressing workplace violence.

Designing and implementing training.

Amazonians are encouraged to participate in designing and implementing training programs, and their suggestions are incorporated into training materials where appropriate.

- Reporting and investigating workplace violence incidents. Amazonians are encouraged to report all
 workplace violence incidents. Where appropriate, the corporate WIM team will work with reporting
 Amazonians and other stakeholders to investigate the incident.
- Management will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.
- Amazonians will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment. These policies include, but are not limited to, Amazon Owner's Manual, the Amazon Code of Conduct and Ethics, the Workplace Incident Management Policy.
- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

EMPLOYEE COMPLIANCE

Our system to ensure that employees comply with the rules and work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, include at a minimum:

 Training employees, supervisors, and managers in the provisions of Amazon's Workplace Violence Prevention Plan (WPVP)

- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WPVP. Amazonians must comply with the WPVP. Failure to comply with the policies and procedures referenced in this WPVP may result in discipline, including termination.
- Provide retraining to employees whose safety performance is deficient with the WPVP.
- Discipline employees for failure to comply with the WPVP.

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between our management team, staff, and other employers, about workplace violence issues is essential to a safe and productive workplace. The following communication system is designed to facilitate a continuous flow of workplace violence prevention information between management and staff in a form that is readily understandable by all employees, and consists of one or more of the following:

- New employee orientation includes workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Effective communication between employees and management about workplace violence prevention and violence concerns. Supervisors are encouraged to communicate with their teams regarding workplace violence prevention, and where appropriate, share information about applicable policies, procedures, and resources.
- Posted or distributed workplace violence prevention information.
- How employees can report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action. Employees can report violent incidents, threats, or other concerns about workplace violence to the <u>ACS Business Assurance Center (BAC)</u>. For emergencies, call 911.
- Employees' concerns will be investigated in a timely manner.

COORDINATION WITH OTHER EMPLOYERS

Amazon will implement the following effective procedures to coordinate implementation of its plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- All employees will be trained on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

Amazon will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to the BAC, the employee's manager, or the WPVP plan administrator, who will inform the appropriate stakeholders for additional review and investigation.
- Generally, employees can report incidents via the BAC. The BAC can be reached via several methods, including:

Phone: 800-929-1896

Email: acs@amazon.com

Text: 844-972-1449

- Web Chat
- SIM-T: Submit a ticket

A strict non-retaliation policy is in place. Any retaliation against an individual who reports an incident is subject to discipline, including termination.

EMERGENCY RESPONSE PROCEDURES

Amazon has in place the following specific measures to handle actual or potential workplace violence emergencies:

- Effective means to alert employees of the presence, location, and nature of workplace violence
 emergencies via an emergency notification system. ACS currently sends emergency messages to
 Amazon email addresses, personal email addresses, and personal cell phones via SMS text. More
 information regarding emergency messaging procedures, including for traveling employees, is available
 here. As appropriate, alarm systems may also be used to alert employees of emergencies.
- Amazon maintains evacuation and sheltering plans for emergency situations. Information regarding building specifics and emergency procedures, including evacuation information, emergency equipment, emergency preparedness kits, first aid kits, fire extinguishers, and the site Emergency Response Manual are maintained on the site Inside Amazon page.
- If there is immediate danger, employees should always immediately call 911. For all other incidents, employees should contact the BAC via any of the methods referenced above.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by Amazon to ensure that workplace violence hazards are identified and evaluated:

ACS, WIM, and additional relevant Amazon stakeholders will review applicable policies, procedures and
controls, and conditions in the workplace to ensure that applicable workplace violence hazards are
identified, evaluated, and addressed. These reviews shall be conducted when the plan is first established,
after each workplace violence incident, and whenever the employer is made aware of a new or previously
unrecognized hazard.

ACS, WIM, or other relevant stakeholders will review all submitted/reported concerns of potential hazards:

Periodic Inspections

Periodic reviews and inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence.

Multiple Amazon stakeholders may be responsible for reviewing or inspecting the workplace to identify and evaluate workplace violence hazards.

Inspections for workplace violence hazards may include assessing:

- The physical security of the workplace, including badging and access controls, to reduce intrusions.
- Existing surveillance measures, including cameras.
- Procedures for reporting suspicious persons or activities.

- Effective location and functioning of emergency buttons and alarms.
- Sharing contact information for emergency responders, and avenues to report workplace violence incidents and concerns
- Employee escape routes, evacuation procedures, and assembly points.
- Frequency and severity of threatening or hostile situations that may lead to violent acts
- Effective procedures and skills for security guard vendor partners in safely handling threatening or hostile interactions with employees or community members
- Effectiveness of emergency response systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance
- The availability of employee escape routes and evacuation procedures.
- Frequency and severity of employees' reports of threats of physical or verbal abuse by managers, supervisors, or other employees.
- Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner. Amazon will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection. Wherever possible, security professionals will be utilized to correct imminent workplace violence hazardous conditions, and where appropriate, in conjunction with law enforcement or other emergency responders.
- As appropriate based on the type of workplace violence hazard, and the stakeholder team responsible for addressing it, written records regarding the corrective actions will be created and maintained.
- Corrective measures for workplace violence hazards will be specific to a given work area.
- Although not comprehensive, Amazon mitigates against specified workplace violence hazards, including:
 - Making the workplace unattractive to intruders by:
 - Utilizing badge access, security turnstiles, door locks, and other security measures to limit access to the site by uninvited intruders.
 - Deploying security guards and other specialized security teams to deter and/or respond to workplace violence incidents.
 - Utilizing security surveillance cameras in and around the workplace.
 - Ensuring the adequacy of workplace violence systems.
 - Sharing contact information for emergency responders, and avenues to report workplace violence incidents and concerns.
 - o Implementing emergency response systems and procedures that warn others of actual or potential

workplace violence danger or that summon assistance.

- Ensuring adequate employee escape routes, evacuation procedures, and assembly points.
- Increasing awareness by employees, supervisors, and managers of the warning signs of potential workplace violence via training materials.
- Ensuring that employee disciplinary and discharge procedures address the potential for workplace violence. Employees who engage in workplace violence or harassment are subject to discipline, including termination.
- Enforcing policies prohibiting weapons in the workplace.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WPVP administrator or their designee will follow all applicable Amazon incident investigation policies, including the WIM Policy or others, as appropriate. All workplace incidents will be fully investigated. These investigations may include, but are not limited to:

- Visit the scene of an incident as soon as safe and practicable.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensuring corrective actions are taken.
- Obtain any reports completed by law enforcement.
- The facility violent incident log will be used for every workplace violence incident and will include information, such as:
 - The date, time, and location of the incident.
 - The workplace violence type or types involved in the incident.
 - A description of the incident.
 - A classification of who committed the violence, including 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, including, but not limited to, 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.

- o The type of incident, including, but not limited to, whether it involved any of the following:
 - Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - Threat of physical force or threat of the use of a weapon or other object.
 - Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - Animal attack.
 - Other
- Consequences of the incident, including, but not limited to:
 - Whether security or law enforcement was contacted and their response.
 - Actions 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 completed.
- Reviewing all previous incidents.
- In some cases, support and resources may be provided to affected employees.

Amazon will ensure that no personal identifying information is recorded or documented in the written investigation report. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence practices. Training and instruction will be launched as follows:

- When the WPVP is first established.
- Annually to ensure all employees understand and comply with the plan.
- Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

Amazon will provide its employees with training and instruction on the definitions found on page 1 of this plan and the requirements listed below:

- The employer's WPVP, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
- Workplace violence hazards relevant to the employees' jobs, the corrective measures Amazon has

implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.

- The violent incident log and how to obtain copies of records pertaining to this WPVP.
- Opportunities for interactive questions and answers with a person knowledgeable about the WPVP.

EMPLOYEE ACCESS TO THE WRITTEN WPVP

Amazon ensures that the WPVP plan shall be in writing and shall be accessible to employees.

RECORDKEEPING

Amazon will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.
- Create and maintain training records for a minimum of one (1) year and include the following:
 - Training dates.
 - Contents or a summary of the training sessions.
 - Names and job titles of all persons completing the training sessions.
- Maintain violent incident logs for minimum of five (5) years.
- Maintain records of workplace violence incident investigations for a minimum of five (5) years.
 - The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.

EMPLOYEE ACCESS TO RECORDS

The following records shall be made available to employees and authorized individuals, upon request and without cost, for examination and copying within **15 calendar days of a request**:

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent incident logs.

REVIEW AND REVISION OF THE WPVP

The Amazon WPVP will be reviewed for effectiveness:

- At least annually.
- When a deficiency is observed or becomes apparent.
- After a workplace violence incident.
- As needed.