

NBCUniversal **California Workplace Violence** **Prevention Plan**

Location : Production Worksites

Date of Last Review: June 1, 2024

Date of Last Revision(s): June 1, 2024

I. INTRODUCTION

To ensure our compliance with state law, and to promote practices and procedures intended to support a safe and secure workplace for you and your fellow employees, NBCUniversal (“Company”) adopts this Workplace Violence Prevention Plan (“WVPP” or “Plan”).

II. GENERAL POLICY STATEMENTS

The Company seeks to provide a safe and secure work environment for all employees, contractors, vendors, visitors, and other individuals with whom we may interact. This WVPP, along with the corresponding Injury and Illness Prevention Program (“IIPP”), covers all Company employees. While at the workplace, or while engaged in the Company’s business at off-site locations, all employees are expected to comply with health and safety laws, regulations, and Company policies. Employees teleworking from a location of the employee’s choice, which is not under the control of the Company, are exempt from this policy. The WVPP will be in effect at all times and in all work areas. This Plan will be available and accessible to employees and authorized employee representatives.

All our employees share in the important responsibility for helping implement, enforce, and maintain the WVPP, with the Company’s Corporate and Business Security teams having important leadership roles in evaluating and ensuring the WVPP’s effectiveness and the development of a corporate culture that supports the goal of a violence free workplace.

III. DEFINITIONS

To effectively address risks of workplace violence, it’s important to understand the meaning of the key terms defined below:

- “**Emergency**” means unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.
- “**Engineering controls**” mean an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard.
- “**Log**” or “**violent incident log**” means the violent incident log required by California Labor Code 6401.9.
- “**Workplace Violence Prevention Plan**” and “**WVPP**” mean the workplace violence prevention plan required by Labor Code 6401.9.
- “**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.
- “**Workplace violence**” means any act of violence or threat of violence that occurs in a place of employment, and 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” 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.
- Workplace violence does not include lawful acts of self-defense or defense of others.
- “Work practice controls” means procedures and rules which are used to effectively reduce workplace violence hazards.

IV. **GENERAL ROLES AND RESPONSIBILITIES**

In fulfilling the important standards of this WVPP, the following roles and responsibilities are identified below:

WVPP Responsibility	Job Title/Position
Corporate high-level implementation	SVP, West Coast Security Operations VP, Security Ops & Process Excellence
Review the effectiveness of the Plan and revise the Plan as needed	VP, Security Ops & Process Excellence
Final approval of the Plan, and any revisions to the Plan	SVP, West Coast Security Operations VP, Security Ops & Process Excellence
Develop and implement procedures to obtain active involvement of employees and authorized employee representatives in developing and implementing WVPP	VP, Security Ops & Process Excellence
Develop and implement effective procedures for the Company to accept and respond to reports of workplace violence, and to prohibit retaliation against an employee who makes such a report	VP, Security Ops & Process Excellence VP, Fair Employment Practices & Policies
Develop and review procedures to respond to actual or potential workplace violence emergencies	SVP, West Coast Security Operations
Develop and ensure all employees are provided with the required training	Director, Physical Security Programs VP, Corporate HR
Provide WVPP training to employees and maintain accurate training records	Director, Physical Security Programs Sr. Manager, HR Operations
Answer employee questions about the training	Workplace Violence Prevention Project Manager
Develop procedures to identify and evaluate workplace violence hazards, including, but not limited to, scheduled periodic	SVP, West Coast Security Operations VP, Security Ops & Process Excellence

inspections to identify unsafe conditions and work practices and employee reports and concerns	
Conduct workplace inspections and create inspection and corrective measure records	VP, Production & Event Security
Review and evaluate workplace violence hazards identified during inspections	VP, Production & Event Security
Approve corrective measures	SVP, West Coast Security Operations
Correct workplace violence hazards identified and evaluated during inspections	VP, Production & Event Security
Ensure supervisors and managers communicate with employees regarding workplace violence matters	Human Resources Team
Oversee post incident response and investigation	SVP, West Coast Security Operations
Conduct workplace violence investigations and create investigation reports	VP, Production & Event Security
Provide the results of any investigations to employees	Human Resources Team VP, Production & Event Security
Create violent incident logs	Workplace Violence Prevention Project Manager
Maintain the required recordkeeping documents required by the WVPP, including inspection records, training records, violent incident logs, and post incident investigation reports	Workplace Violence Prevention Project Manager
Coordinate implementation of the WVPP with other employers onsite, when applicable	Sourcing Team Director, Physical Security Programs
Assist with ensuring that supervisory and nonsupervisory employees comply with the WVPP onsite	Director, Physical Security Programs

V. EMPLOYEE AND AUTHORIZED EMPLOYEE REPRESENTATIVE INVOLVEMENT

The Company encourages involvement of employees and authorized employee representatives in developing and implementing the WVPP by the following:

- Encourage reporting of potential workplace violence hazards to the Production Safety Hotline at 818.777.2153 or your assigned production contact.
- Encourage anonymous reporting of potential workplace violence hazards and other complaints via the Comcast NBCUniversal Listens Helpline (877-40-LISTENS) or via the [Web Portal](#).
- Employees can participate in designing and implementing training programs, and their suggestions may be incorporated into the training materials. For example, an employee might suggest a new training scenario based on a recent incident.
- Employees and authorized employee representatives can provide feedback on any other aspect of the Plan to WorkplaceSecurity@nbcuni.com

- Ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees.
- All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment.
- 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.

Employees can reach out directly to WorkplaceSecurity@nbcuni.com to discuss additional ways to participate in the development and implementation of WVPP or training.

VI. COORDINATION WITH OTHER EMPLOYERS

The Company will coordinate the implementation of this WVPP with other employers, when applicable, to ensure mutual understanding with those employers and their employees of their respective roles and responsibilities. The Company will further coordinate with the other employers to ensure workplace violence incidents involving any employee are reported, investigated, and recorded as required by this WVPP. If there are multiple employers at the worksite, the employer or employers whose employees experienced the workplace violence incident must record the information in their company's violent incident log and must provide a copy of that log upon request to the Company. The Director, Physical Security Programs will oversee this coordination.

The Company will coordinate with other employers, when applicable, in a variety of ways, including but not limited to addressing expectations, requirements and responsibilities in contractual agreements with contractors and vendors and providing other employers with the Company's WVPP as needed and confirm training of the Company's WVPP with other employers as warranted. The Sourcing team will oversee the coordination of contractual agreements and related requirements.

VII. REPORTING AND RESPONDING TO WORKPLACE VIOLENCE REPORTS

Employees currently experiencing a life-threatening emergency should immediately call 911. Employees are encouraged to immediately report threats or acts of workplace violence to the Production Safety Hotline at 818.777.2153 or your assigned production contact. Whenever dealing with threats or acts of workplace violence, however, the first priority is always to ensure that you are not in danger and to secure the area to ensure that others are not harmed or injured (if it's safe to do so).

In most instances, the worksite's designated Security contact, on-site leader, or assigned production contact will respond by assessing the seriousness level of the workplace violence incident and the need to secure the area to ensure the safety of workers and visitors. They will contact law enforcement, if appropriate, and coordinate with law enforcement on the reporting and investigation in the workplace violence incident.

The Company strictly prohibits retaliation against any employee for making a good faith report of workplace violence.

Employees can also report any concerns they have related to workplace violence to their

Supervisor or another local leader, contact their Human Resources representative, contact the Comcast NBCUniversal Listens Helpline, or their assigned production contact. All concerns will be investigated by the appropriate party and the results of that investigation will be reported to the employee when appropriate.

For more information on the Company's procedures for responding to workplace violence emergencies, please see section XII- Responding to Workplace Violence Emergencies.

VIII. POST WORKPLACE VIOLENCE INCIDENT RESPONSE AND INVESTIGATIONS

Following a workplace violence incident, the worksite's designated Security contact will also conduct an incident investigation, which may, as appropriate, include an interview of involved parties or witnesses, a site inspection, review of the site-specific engineering controls, this WVPP and other related policies, violence incident log, and training records of the involved or affected employees.

The results of the investigation will be recorded. Upon determining any corrective action, the corrective action and date of completion will be included. Employees will be informed of the results of the investigation and any corrective actions to be taken by the employee's assigned HR partner or worksite's designated Security contact, as appropriate.

IX. IDENTIFYING, EVALUATING AND CORRECTING WORKPLACE VIOLENCE HAZARDS

A. Identifying & Evaluating Workplace Violence Hazards

To identify and evaluate potential workplace violence hazards, the Company will conduct scheduled periodic inspections, review employee reports and concerns, the violent incident log, and any other measures it deems necessary.

The worksite's designated Security contact conducts periodic inspections, as required by the WVPP. Such inspections are not intended to reduce or negate individual employee's obligations to routinely evaluate their work surroundings and identify and bring concerns to the attention of the worksite's designated Security contact. Inspections shall occur (at a minimum):

- (a) When the WVPP is first established;
- (b) Periodically;
- (c) After each workplace violence incident; and
- (d) Whenever the Company is made aware of a new or previously unrecognized hazard.

To assist the Company in conducting the periodic inspections, a workplace violence prevention inspection checklist is used. The checklist should be reviewed by the worksite's designated Security contact to add any additional areas or operations that should be inspected which are specific to that department and work area. Revised checklists will be provided to the VP, Security Operations & Process Excellence for review and approval. In addition, during the inspection, the designated inspector should also add any additional comments or observations that may be useful in identifying or evaluating potential concerns.

Completed inspections are submitted to the VP, Production Security who promptly reviews the forms. The SVP, West Coast Security Operations has final approval of which corrective or remedial measures are appropriate or necessary, if any. All inspection records are maintained by the Director, Physical Security Programs for five years.

B. Correcting Workplace Violence Hazards

The worksite's designated senior Security leader in partnership with the Facilities or Business leader is responsible for correcting workplace violence hazards discovered in a scheduled periodic inspection, as a result of a new or previously unrecognized hazard, during normal operations, or as otherwise observed and discovered. The responsible individuals are expected to correct unsafe conditions based on the severity of the hazard and in accordance with the Company's Injury and Illness Prevention Plan. Specific procedures that must be used to correct hazards include, but are not limited to, the following:

1. Implementing corrective, remedial measures and engineering controls in a timely manner.
2. When a workplace violence emergency or imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, follow the procedures in the Responding to Workplace Violence Emergencies section of this policy. This includes, to the extent possible, removing all exposed personnel from the area except those necessary to correct the existing hazard. Employees necessary to correct the hazardous condition shall be provided with the necessary safeguards. Stopping operations at the location of an imminent hazard until the hazard is neutralized may also be necessary.
3. Taking appropriate corrective action with workers who do not meet expectations related to the WVPP.

In addition, the SVP, West Coast Security Operations will promptly review inspection forms and will determine whether further corrective or remedial measures are appropriate or necessary. The worksite's designated senior Security leader will then partner with the Facilities or Business leader to establish the scope and timing for any remedial action. The worksite's designated senior Security leader in partnership with the Facilities or Business leader is then responsible for ensuring that the remedial actions are implemented and identified areas of concern resolved. Once the remedial action is completed, a corrected workplace violence action shall be prepared by the worksite's designated senior Security leader, with the original provided to the Director, Physical Security Programs and a copy kept with the Department.

Records of the inspections, and records of any corrective actions taken in response to the inspections, shall be maintained by the Director, Physical Security Programs for a minimum of five years.

X. COMPLIANCE

All supervisory and nonsupervisory employees are expected to comply with this Plan at all times. The Company will ensure compliance with this Plan is in accordance with the compliance section of the Company's Injury and Illness Prevention Plan.

In addition, Human Resources is responsible for ensuring that all safety and workplace violence prevention policies and procedures are communicated to all employees. All employees are responsible for using safe work practices, following all directives, policies, and procedures, assisting in maintaining a safe, violence-free work environment, and, for promoting safety whenever and wherever possible. Supervisors are expected to enforce the rules and expectations fairly and uniformly and without any retaliation.

The following is the Company's system of ensuring that all workers comply with the work practices designed to prevent against workplace violence incidents, ensure incidents are properly addressed when they occur, and maintain a safe work environment:

- Inform workers of the provisions of the WVPP through training all employees on the provisions of the WVPP.
- Take appropriate corrective action with workers who do not meet expectations related to the WVPP.
- Implement effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP.
- Conduct regular safety investigations and ensure remedial measures are taken as needed.
- When necessary, discipline employees for failure to comply with the WVPP and its related policies and procedures.
- Monitor feedback received via a worksite's designated Security contact, WorkplaceSecurity@nbcuni.com, Comcast NBCUniversal Listens Helpline, and other reporting channels available locally.
- Audit practices and policies.

XI. COMMUNICATING WITH EMPLOYEES

The Company recognizes that to maintain a safe and secure work environment it must maintain communication on matters of workplace violence with all employees, including the employees of other employers that work at the Company's worksite. The following is the Company's system of communication, designed to facilitate two-way (management, supervisor, employees, and other employers) safety, health, and security information in a form that is readily understandable to and between all affected site personnel, and maintained free from fear of reprisal:

- New employee training, including discussion of the WVPP and other related policies.
- Formal and informal workplace-specific training and retraining on workplace violence prevention and security.
- Training on how to report a violent incident, threat, or other workplace violence concern to the Company or law enforcement without fear of reprisal, how employee concerns will be investigated and how employees will be informed, as appropriate, of the results of the investigation and any corrective actions to be taken by the Company.
- Regularly scheduled Environmental Health & Safety (EHS) meetings that address security issues and potential workplace violence hazards.
- Effective communication of concerns related to workplace violence between workers and supervisors in a form readily understandable by all employees. Communications may be verbal, written, posted, or email communications, via internal website access, personal or group meetings, or training programs.
- Posted or distributed workplace violence prevention information.
- Employees will not be prevented from accessing communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety.
- Employees can communicate any workplace violence concern or event pursuant to section VII.

XII. RESPONDING TO WORKPLACE VIOLENCE EMERGENCIES

Emergencies include any unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other people onsite. This section outlines the means the Company will use to alert employees of the presence, location, and nature of workplace violence emergencies, evacuation or sheltering plans that are appropriate and feasible for the worksite, and how to obtain help from staff assigned to respond to workplace violence emergencies, security personnel, and law enforcement.

In the event of a workplace violence emergency, the Company will alert employees of the presence, location, and nature of the emergency. The worksite's designated Security contact, in partnership with the Business Continuity & Crisis Management team, will have primary responsibility for providing warning to employees, alerting law enforcement, and/or security, if necessary. **If there is an active emergency, employees should immediately call 911 once it is safe to do so.**

The Company's policies on security and evacuation are shared via on-site meetings or your production contact. The worksite's designated Security contact identifies a chain of command in case of an emergency and provides contact information. Maps of evacuation routes are posted in strategic worksite locations including near entries/exits, elevators, and breakrooms.

XIII. TRAINING

The Corporate and Business Security teams, in partnership with Human Resources, and any employee or their representative, shall participate in the development of training materials and procedures to provide training. Company training will be developed to align with this WVPP as well as any identified workplace violence hazards. The Company will also update training, as deemed necessary, based on workplace incidents. Employees can provide feedback regarding the training to WorkplaceSecurity@nbcuni.com.

The Company provides initial training when the plan is first established, and annually thereafter. Additional training may be provided when a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the WVPP. The additional training may be limited to addressing the new workplace violence hazard or changes to WVPP. All employees at the facility will receive training and instruction in accordance with the below. Training will include (but is not limited to):

- Explanation of our WVPP, how to obtain a copy of the WVPP, and how to participate in development and implementation of the WVPP.
- The definitions and requirements of California Labor Code section 6401.9.
- How to report workplace violence incidents or concerns to the Company or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs, the corrective measures the employer 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.
- How to engage in interactive questions and answers with a person knowledgeable about the WVPP.

The training materials will be appropriate in content and vocabulary to the educational level, literacy, and language of employees.

XIV. REVIEW OF WVPP

The SVP, West Coast Security Operations and VP, Security Operations & Process Excellence review the WVPP for effectiveness at least annually, when a deficiency is observed or becomes apparent, after a workplace violence incident and as otherwise needed. Employees and their authorized representatives are encouraged to actively participate in this review process through the various means listed in the WVPP.

WVPP review should include, but is not limited to:

- Review of incident investigations and the violent incident log.
- Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability.
- Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions should be made promptly and communicated to employees.

XV. VIOLENT INCIDENT LOG

The Company records information on its Violent Incident Log for every workplace violence incident. The information recorded is based on information solicited from the employees who experienced workplace violence, on witness statements, and on investigation findings. The Company omits any element of personal identifying information sufficient to allow identification of any person involved in a violence 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.

The log is reviewed during the periodic reviews of the WVPP. The Log is maintained by the Director, Physical Security Programs.

In the event there are other employers whose employees experience a workplace violence incident at the Company's worksite, that employer will record the information in their violent incident log and must also provide a copy of that log to the Company upon request.

XVI. RECORDKEEPING

The Company keeps records related to this WVPP as follows:

- Records of workplace violence hazard identification, evaluation, and correction (inspection reports) are maintained for a minimum of five (5) years.
- Training records are maintained for a minimum of one (1) year and include training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the training, and names and job titles of all persons attending the training sessions.
- Violent incident logs are maintained for a minimum of five (5) years.
- Records of workplace violence incident investigations are maintained for a minimum of five (5) years. These records shall not contain employee medical records.

All the above-described records, except for incident investigations, must be made available to employees and their representatives, upon request and without cost, for examination and copying within fifteen (15) calendar days of a request. SSO-enabled employees can submit a request [here](#) and all other eligible employees can submit a request [here](#). All records listed in this

section must be made available to Cal/OSHA, upon request. The Director, Physical Security Programs is assigned the role of recordkeeping and maintaining on file at least one copy of the preceding records.