

WORKPLACE VIOLENCE PREVENTION PROGRAM for Rose International, Inc.

Our establishment's Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by [Labor Code \(LC\) section 6401.9](#).

Date of Last Review: 7/01/2024

Date of Last Revision(s): 7/01/2024

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 WVPP administrators, Human Resource (HR) Compliance Managers Emily Penn and Mandi Ashby ("Administrators"), have the authority and responsibility for implementing the provisions of this plan for Rose International, Inc. ("Rose International"). If there are multiple persons responsible for the plan, their roles will be clearly described.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Emily Penn	HR Compliance Manager	<u>Emily is responsible for implementing and maintaining the provisions of this plan on behalf of the company, including training compliance and updating the plan as necessary.</u>	(314) 200-1799	<u>epenn@roseint.com</u>
Mandi Ashby	HR Compliance Manager	<u>Mandi is responsible for implementing and maintaining the provisions of this plan on behalf of the company, including training compliance and updating the plan as necessary.</u>	(636) 373-8851	<u>mashby@roseint.com</u>

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.

EMPLOYEE ACTIVE INVOLVEMENT

Rose International ensures the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan:

- Management and Administrators will work with and allow employees and authorized employee representatives to participate in:
 - Identifying, evaluating, and determining corrective measures to prevent workplace violence. Administrators will routinely evaluate whether any workplace violence related concerns/hazards exist and how to correct them.
 - Management will have monthly safety meetings with employees and their representatives to discuss identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These meetings could involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures).
- Designing and implementing training.
 - Employees are encouraged to participate in designing and implementing training programs, and their suggestions are incorporated into the training materials upon review and approval by Administrators and management.
 - Reporting and investigating workplace violence incidents. Employees will be trained on how/when to report workplace violence conditions, policies and procedures are set forth in this plan, training sessions, and via our company Employee Handbook.
- Management and Administrators 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.
- 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.

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 Rose International Workplace Violence Prevention Plan (WVPP)
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP. Administrators will ensure training is conducted as required under applicable law to ensure compliance with the WVPP. Disciplinary action may result for failure to comply.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace by in-person and/or email recognition.

- Discipline employees for failure to comply with the WVPP. Failure to comply with the WVPP may result in disciplinary action up to and including termination.

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.
- Administrators will routinely meet to address security issues and potential workplace violence hazards
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns. Administrators will ensure that supervisors and managers are able to communicate effectively and in the employees' first language.
- 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 anonymously report a violent incident, threat, or other violence concerns to Administrators and/or local law enforcement authorities, including but not limited to 9-1-1
 - Employees can also report a violent incident, threat, or other violence concerns to our HR Department via the company's secured website at:
<https://www.roseint.com/SecureCommunicationSystem/HRPayrollUpload.aspx>
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety. Employees' concerns will be investigated in a timely manner and they will be informed of the results of the investigation and any corrective actions to be taken. Updates on the status of investigations and corrective actions are provided to employees through written correspondence and/or phone calls. These updates will include information about the progress of investigations, the results of investigations, and any corrective actions taken.

COORDINATION WITH OTHER EMPLOYERS

Rose International 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.
- At a multiemployer worksite, Rose International will ensure that if its employees experience workplace violence incident that Rose International will record the information in a violent incident log and shall provide a copy of that log to controlling employer.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

Rose International will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence are reported to an employee's supervisor or manager, who will inform the WVPP administrator/Human Resources. This will be accomplished by written communications with the employee's supervisor or manager. If that is not possible, employees will report incidents directly to the WVPP administrator, HR Compliance Managers, Emily Penn and/or Mandi Ashby.

Employees can also report incidents to Rose International's HR Department via our secured website at <https://www.roseint.com/SecureCommunicationSystem/HRPayrollUpload.aspx> or via email at HR@roseint.com.

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. Rose International has a strict non-retaliation policy and prohibits retaliation against individuals who report an incident. Any employee who is determined to have violated this non-retaliation policy may be subject to disciplinary action up to and including termination.

EMERGENCY RESPONSE PROCEDURES

Rose International 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 by the following: an announcement and/or alarm system and company office locations; otherwise, via mass email.

- Rose International will have evacuation or sheltering plans as necessary, including emergency exit locations and instructions for sheltering in place at office locations.
- How to obtain help from staff, security personnel, or law enforcement. For immediate threats and/or danger, employees should contact 9-1-1 or their local law enforcement. If there is any question as to who/where to call, employees should reach out to the WVPP Administrators immediately. Notwithstanding, employees should notify WVPP Administrators of any related concerns.

In the event of an emergency, including a Workplace Violence Emergency, contact the following:

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Emily Penn	HR Compliance Manager	<u>Emily is responsible for implementing and maintaining the provisions of this plan on behalf of the company, including training compliance and updating the plan as necessary.</u>	(314) 200-1799	<u>epenn@roseint.com</u>
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- 9-1-1
- Local law enforcement.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

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

- Inspections 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.

Review all submitted/reported concerns of potential hazards: Administrators will review all reports/concerns upon receipt via email or the company's secured website. Administrators will also respond to reports/concerns provided via phone.

Periodic Inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence. Periodic Inspections/Evaluations shall be conducted quarterly, at least, unless otherwise needed

Periodic inspections to identify and evaluate workplace violence and hazards will be performed by the following designated personnel in the following areas of the workplace:

Specific Person Name/Job Title	Area/Department/Specific location
Emily Penn	LV Headquarters
Mandi Ashby	STL Headquarters

Inspections for workplace violence hazards include assessing:

Factors specific to the workplace that may result in risk of workplace violence may include:

Examples:

- The exterior and interior of the workplace for its attractiveness to robbers.
- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a robbery or other criminal act, including our policy prohibiting employees, who are not security guards, from confronting violent persons or persons committing a criminal act.
- Procedures for reporting suspicious persons or activities.
- Effective location and functioning of emergency buttons and alarms.
- Posting of emergency telephone numbers for law enforcement, fire, and medical services.
- Whether employees have access to a telephone with an outside line.
- Whether employees have effective escape routes from the workplace.
- Whether employees have a designated safe area where they can go to in an emergency.
- Adequacy of workplace security systems, such as door locks, entry codes or badge readers, security

windows, physical barriers, and restraint systems.

- Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Employees' skill in safely handling threatening or hostile service recipients (example: security guards).
- Effectiveness of systems and procedures that warn others of actual or potential workplace violence danger or that summon assistance, e.g., alarms or panic buttons.
- The use of work practices such as the "buddy" system for specified emergency events.
- The availability of employee escape routes.
- How well our establishment's management and employees communicate with each other.
- Access to and freedom of movement within the workplace by non-employees, including recently discharged employees or persons with whom one of our employees is having a dispute.
- 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. Rose International 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. If applicable, employees necessary to correct the hazardous condition will be provided with the necessary protection. As needed, Administrators will contact local law enforcement for assistance/guidance.
- All corrective actions taken will be documented and dated on the appropriate forms. Administrators will maintain and manage a log describing corrective actions.
- Corrective measures for workplace violence hazards will be specific to a given work area.
 - Additional procedures may include the following: Make the workplace unattractive to robbers by:
 - Improve lighting around and at the workplace.
 - Post of signs notifying the public that limited cash is kept on the premises and that cameras are monitoring the facility.
 - Utilize surveillance measures, such as cameras and mirrors, to provide information as to what is going on outside and inside the workplace and to dissuade criminal activity.
 - Hire security guards and have them patrol the workplace interior and perimeter.
 - Install security surveillance cameras in and around the workplace.

- Provide workplace violence systems, such as door locks, violence windows, physical barriers, emergency alarms and restraint systems by:
 - Ensure the adequacy of workplace violence systems
 - Post emergency telephone numbers for law enforcement, fire, and medical services
 - Control, access to, and freedom of movement within, the workplace by non-employees, include recently discharged employees or persons with whom one of our employees is having a dispute.
 - Install effective systems to warn others of a violence danger or to summon assistance, e.g., alarms or panic buttons.
- Ensure employees have access to a telephone with an outside line. Provide employee training/re-training(refreshers) on the WVPP, which could include but not limited to the following:
 - Recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
 - Ensure that all reports of violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the person making the threat.
 - Improve how well our establishment's management and employees communicate with each other.
 - Procedures for reporting suspicious persons, activities, and packages.
 - Provide/review employee, supervisor, and management training on emergency action procedures.
 - Ensure adequate employee escape routes.
 - Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence.
 - Ensure that employee disciplinary and discharge procedures address the potential for workplace violence.
 - Establish a policy for prohibited practices [describe what those are, such as a no-weapons policy.
 - Limit the amount of cash on hand and use time access safes for large bills.
 - Provide procedures for a "buddy" system for specified emergency events.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WVPP administrator or their designee will implement the following post-incident procedures:

- 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 violent incident log will be used for every workplace violence incident and will include information, such as: (See attached Violent Incident Log)
 - The date, time, and location of the incident.
 - The workplace violence type or types involved in the incident.
 - A detailed 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.
 - 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.
- Support and resources, such as counseling services, are provided to affected employees (These resources could include referrals to counseling services, information about employee assistance programs, and time off work if necessary).

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. These sessions could involve presentations, discussions, and practical exercises. Training and instruction will be provided as follows:

- When the WVPP 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.

Rose International 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 WVPP, 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 specific to the employees' jobs, the corrective measures Rose International 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 hazard identification, evaluation and correction, training records, and violent incident logs.

- Opportunities Rose International has for interactive questions and answers with a person knowledgeable about the Rose International plan.

Note: *Employers must use training material appropriate in content and vocabulary to the educational level, literacy, and language of employees.*

EMPLOYEE ACCESS TO THE WRITTEN WVPP

Rose International ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by unobstructed access via Rose International's Employee Pages Website and through email distribution. Employees will be able to review, print, and email the most current version of Rose International's written WVPP. Copies will also be provided upon request.

RECORDKEEPING

Rose International 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 qualifications of persons conducting the training.
 - Names and job titles of all persons attending 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.
- All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by [LC section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

EMPLOYEE ACCESS TO RECORDS

The following records shall be made available to employees and their representatives, 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 WVPP

The Rose International WVPP will be reviewed for effectiveness:

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

Review and revision of the WVPP will include the procedures listed in the EMPLOYEE ACTIVE INVOLVEMENT section of this WVPP, as well as the following procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan's effectiveness:

- Review of Rose International's WVPP 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 (if applicable).
- Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees. [These revisions could involve changes to procedures, updates to contact information, and additions to training materials.]

EMPLOYER REPORTING RESPONSIBILITIES

As required by California Code of Regulations (CCR), Title 8, Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries, Rose International will immediately report to Cal/OSHA any serious injury or illness (as defined by CCR, Title 8, Section 330(h)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.

Emily Penn, HR Compliance Manager of Rose International, Inc., hereby authorizes and ensures the establishment, implementation, and maintenance of this written workplace violence prevention plan and the documents/forms within this written plan. I believe that these policies and procedures will bring positive changes to the workflow, business operations, and overall health and safety as it relates to workplace violence prevention.

Emily Penn
Human Resources Compliance Manager

07/01/2024