Policy Name: **California Workplace Violence Prevention Plan (WVPP)**
Policy Applies to: **All Associates, Contractors, Temporary Associates**

Prepared by	**Effective Date**
Safety	July 1, 2024

A. Purpose

PODS Enterprises, LLC (PODS) provides a safe and healthy environment for every associate, customer or others present at a PODS facility. The Workplace Violence Prevention Plan ("WVPP" or the "Plan") aims to protect associates from aggressive and violent behavior in the workplace in accordance with California Senate Bill 553 and California Labor Code section 6401.9. The Plan applies to all California places of employment and facilities operated by PODS.

B. Implementation

1. The following individuals are responsible for implementing the Plan:
   - Director – Enterprise Safety, Jamie Messerschmidt (Email: jmesserschmidt@pods.com or Phone (610) 739-8868)
     - WVPP administrator.
     - Authority and responsibility for implementing this Plan for PODS.
   - Regional Safety Manager (West), Adam Carroll (Email: acarroll@pods.com or Phone 503-983-6645)
     - Address "Issues" reported via SafetyCulture and escalate as necessary.
     - Conduct investigations and involve necessary parties while maintaining confidentiality.
     - Maintain Workplace Violent Incident Log.
     - Conduct training sessions, work with locations and associates to address issues and notify WVPP administrator when changes to the Plan are warranted.
   - Manager - Corporate Physical Security, David Dalton (Email: Ddalton2@pods.com or Phone 727-330-5789)
     - Assist with workplace violence investigations, as requested.
     - Provide security options and guidance, as requested.
     - Liaise with local law enforcement and security professionals, as requested.
   - Market Managers and Assistant Market Managers
     - Responsible for implementing and maintaining the WVPP in their facilities and for answering associate questions about the WVPP.
   - Associates and Guests
     - Required to adhere to the policies and procedures set forth within the WVPP upon entering PODS facilities.
     - PODS associates and guests are encouraged to embrace a "see something, say something'' mentality when it comes to communicating concerns around potential threats.

2. The Plan is accessible to associates and authorized representatives by request to local Manager or can be found on the PODS intranet at https://wearepodsintranet.pods.com/ – Corporate – Safety – Policies & Procedures – California – PODS California Workplace Prevention Plan.

C. Definitions

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 associate that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the associate 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 associate 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 associates with the intent to commit a crime.

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

  Type 3 violence - Workplace violence against an associate by a present or former associate, 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 associate.

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

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

D. Active Associate Involvement

PODS obtains the active involvement of associates and authorized associate representatives in developing and implementing the Plan. PODS involves associates and authorized representatives in the identification, evaluation, and correction of workplace violence hazards, including soliciting

involvement in designing and implementing training, and in reporting and investigating workplace violence incidents through the following methods:

- **All-Hands Safety Meetings**: Associates will be invited to give feedback directly to the management team and Plan administrators throughout the Plan's development and implementation.
- **Morning Huddle Meetings**: Associates will be invited to give feedback directly to local managers during daily/weekly meetings.

E. Communication, Reporting and Response to Workplace Violence

1. PODS' system for communicating the Plan and workplace violence matters includes utilizing a format that is readily understandable by associates that suits our culture, technology, methods, and workplaces.

2. PODS accepts and responds to all reports of workplace violence. Associates can report a violent incident, threat, or other workplace violence concern to PODS or law enforcement using the following methods:

    - **SafetyCulture QR Code**: SafetyCulture is an internet-based workplace operations platform used by PODS to streamline workflow and reporting capabilities for workplace violence concerns. By scanning the QR code that is accessible via the We Are PODS Intranet or on posters throughout the facility, SafetyCulture allows associates to anonymously report violent incidents, potential and actual threats or concerns without fear of reprisal.
    - **Direct Reporting to Managers**: Associates are encouraged to report imminent threats directly to their on-site managers for immediate action.
        a. Managers shall submit all reports received via "Issues" in SafetyCulture or by calling 9-1-1 based on the severity of the report.
    - **Direct Reporting to West Region Safety Manager**
    - **Direct Reporting to Director – Enterprise Safety**

3. PODS strictly prohibits any retaliation against any associate who reports workplace violence. Any associate who believes they have experienced retaliation due to reporting workplace violence should contact: West Region HRBP, West Region Safety Manager or Director – Enterprise Safety.

F. Workplace Violence Hazard Identification, Evaluation, and Correction

1. PODS conducts inspections of facilities as needed to identify unsafe conditions, work practices, and associate reports or concerns related to workplace violence and to ensure compliance with PODS' workplace violence prevention policies and procedures. Inspections will be conducted when the Plan is first established, after each workplace violence prevention incident, and whenever PODS is made aware of a new or previously unrecognized hazard. The following individuals will conduct these inspections:

    - The Safety Department and the Physical Security Department, in collaboration with regional and local managers, will inspect PODS facilities initially, periodically, and after each workplace violence prevention incident at the specific location.

- The Internal Audit Department will oversee the performance of self-audits of PODS facilities by regional and local managers periodically. These inspections include identifying existing or potential risks related to workplace violence. Documentation of each inspection is prepared using the California Workplace Violence Hazard Assessment in SafetyCulture or the Self Audit Program Guide.

2. Inspection results are reviewed and evaluated by the Safety Department to facilitate continuous improvement and correction.

3. PODS will correct workplace violence hazards in a timely manner. The following procedures will be implemented to effectively mitigate identified risks:

    - If an active emergency exists, contact 9-1-1 or the local emergency number.
        - The Emergency Action Plan (posted on the facility bulletin board) shall be followed in active emergency situations.
    - When an imminent (not yet active) workplace violence hazard is present and cannot be immediately neutralized, all affected associates will be evacuated from the area, except those associates who are essential for rectifying the situation. The associates with the skills and roles critical for mitigating the hazard will be provided with appropriate safety equipment and support to ensure their protection while managing the situation.
    - All actions to correct workplace violence hazards will be documented using designated forms and submitted to the Safety Department through SafetyCulture "Actions".
    - Corrective strategies for addressing workplace violence hazards will be tailored to the specific needs and conditions of the affected work area and facility.

G. Post Incident Response and Investigation Procedures

After a workplace violence 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 associates, 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.
- Implement corrective measures to prevent similar incidents from occurring.
- Record the findings and ensure corrective measures are taken.
- Obtain any reports completed by law enforcement.

PODS will inform associates of the results of the investigation and any corrective measures taken as appropriate.

H. Emergency Response

When an emergency arises, stay composed and first identify if there are immediate safety concerns. Our priority is always the safety of associates, customers, and the public. Communication is key. If an associate discovers a situation that may represent a potential threat to PODS and/or PODS associates,

the associate should immediately contact their manager or supervisor. If an associate is involved in an emergency that is actively unfolding, the associate should immediately find a place of safety and call 9-1-1.

1. PODS has procedures to alert associates to the presence, location, and nature of workplace violence emergencies:
    - **AlertMedia**: AlertMedia is an easy-to-use messaging system that allows PODS to quickly disseminate urgent or critical information to associates via many avenues, including SMS text messages, voice calls, emails, and app notifications.
    - **Dedicated Phones**: Each PODS truck is equipped with a phone for drivers to maintain open lines of communication with management during a shift and to enable direct communication with emergency services and supervisors.
    - **Group SMS Text Messages**: Local managers can send group SMS text messages to associates.
    - **Verbal Announcements**: Local managers will make real-time announcements to direct associates within a PODS facility.

2. PODS has procedures for evacuation or sheltering that are appropriate and feasible for the worksite outlined in the Emergency Action Plan posted on the facility bulletin board.

3. PODS has procedures for associates to obtain help from staff assigned to respond to workplace violence emergencies such as security personnel or law enforcement, if applicable, outlined in the facility Emergency Action Plan posted on the facility bulletin board.

I. Training Procedures

PODS provides effective training on the Plan to all associates, including management and supervisors. The training will be provided when the Plan is first established and annually thereafter, upon hire, and whenever a new or previously unrecognized hazard has been identified. Trainees will have the opportunity for interactive questions and answers with a person knowledgeable of the Plan. The training consists of the following:

- The Plan, how to obtain a copy of the Plan at no cost, and how to participate in development and implementation of the Plan;
- The definitions and requirements contained in Labor Code Section 6401.9, which are also contained in **Section C** of the Plan;
- How to report workplace violence incidents or concerns to PODS or law enforcement without fear of reprisal;
- Workplace violence hazards specific to the associates' job, the corrective measures PODS has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm;
- The Violent Incident Log (described in **Section K**) and how to obtain copies of the following records: (1) records of workplace violence hazard identification, evaluation, and correction; (2) workplace violence prevention training records; and (3) violent incident logs.

J. Coordination with other Employers

PODS will coordinate implementation of the Plan with other employers, when applicable, to ensure that those employers and their personnel understand their respective roles, as provided in the Plan.

PODS will coordinate with other employers, when applicable, to ensure that all associates are provided workplace violence prevention training and that workplace violence incidents involving any associates are reported, investigated, and recorded. The coordination procedures are as follows:

- PODS will provide a copy of the Plan to other employers, where applicable, and confirm reporting methods for non-PODS associates.
- At a multiemployer worksite, PODS will ensure that if associates experience a workplace violence incident, PODS will record the information in a violent incident log and will also provide a copy of that log to the controlling employer.

K. Violent Incident Log

PODS will record information in a Violent Incident Log (Appendix A) for every workplace violence incident. The log shall include all the following:

- The date, time, and location of the incident.
- The workplace violence type or types.
- 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 associate 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 associates 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.

The log must exclude all elements of personal identifying information that could lead to the identification of anyone involved in a violent incident. This includes, but is not limited to, the person's name, address, email address, telephone number, social security number, or any other details that, either on their own or together with other publicly accessible information, could disclose the person's identity.

L. Compliance with Plan

All associates must comply with the Plan. PODS trains associates, supervisors, and managers on the Plan. The training teaches the Plan's objectives, the specific roles and responsibilities of each staff member, and the procedures to follow to maintain a safe working environment. If an associate's safety performance does not meet the standards of the Plan, the associate will undergo retraining to address the specific areas where the associate has shown lapses, with the goal of reinforcing the importance of compliance with the Plan. Failure to comply with the Plan could result in discipline, up to and including termination.

M. Recordkeeping

PODS will create and maintain the following records:

a. Records of workplace violence hazard identification, evaluation, and correction will be maintained for five years.
b. Training records will be maintained for one year in PODS Learning Management System (LMS).
c. Violent incident logs will be maintained for five years.
d. Records of workplace violence incident investigations will be maintained for five years.

Records will be made available to associates and their representatives for examination and copying within fifteen calendar days of a request.

N. Review of Plan Effectiveness

PODS will review the effectiveness of the Plan as needed. The Plan will be reviewed at least annually, when a deficiency is observed or becomes apparent, and after a workplace violence incident.

PODS will obtain the active involvement of associates and authorized associate representatives in reviewing the Plan. Key aspects of this review will include, but is not limited to:

Incident Analysis: A thorough examination of incident investigations and the Violent Incident Log to identify patterns, assess risk management effectiveness, and determine necessary changes.

Security Assessment: An evaluation of the current security measures, including alarms, external monitoring systems, and emergency response protocols to ensure optimal protection.

Risk Management Evaluation: A critical review of how violence risks are identified, evaluated, and corrected, with prompt implementation of necessary revisions and communication to all associates. These changes could include procedural adjustments, updates to emergency contact lists, and enhancements to training programs.

Real-World Conditions and Concerns: Soliciting and integrating feedback from associates to ensure the WVPP reflects the real-world conditions and concerns in the workplace.

By following these detailed procedures, PODS ensures that the Plan remains effective and is continuously evolving to meet the safety and security needs of all associates.

O. Revision History

Date	Section	Change	Author
6/18/2024		Initial policy	Safety & Legal