

The **Ingenovis Health Workplace Violence Prevention Plan (WVPP)** addresses the hazards known to be associated with the four types of workplace violence as defined by [California Labor Code section 6401.9](#). This WVPP applies to Ingenovis Health and its portfolio family of brands who have employees working in the state of California, collectively referred to as “Ingenovis Health” or the “Company.”

The purpose of the WVPP is to reduce violent incidents in the workplace through improved employee awareness, violent incident identification and reporting, tracking of violent incidents, and corrective actions when hazards are recognized.

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 or Violent Incident Log - An incident reporting log used to record all violent incidents that occur in the workplace as required by [California Labor Code section 6401.9](#).

Plan or WVPP - The Workplace Violence Prevention Plan required by [California Labor Code 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.

Violent Incident Report - An incident report form documenting details of the violent incident reported used in investigation and as a resource in completing the Violent Incident Log.

Work Practice Controls - Procedures and rules which are used to effectively reduce workplace violence hazards.

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.

Workplace Violence Types consist of the following four types:

Violence Type	Description	Example
Type 1 Violence by Strangers	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.	<i>Therapist assaulted by stranger.</i>
Type 2 Violence by Client, Patient, Visitor, Volunteer	Workplace violence directed at employees by clients, patients, students, visitors, or volunteers.	<i>Nurse assaulted by a patient.</i>
Type 3 Violence by Current or Past Coworkers	Workplace violence against an employee by a present or former employee, supervisor, or manager.	<i>Disgruntled employee returning to worksite to do harm.</i>
Type 4 Violence by Individual with Personal Relations with Employee	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.	<i>Domestic abuse situations where partner comes to worksite to do harm.</i>

Violence may include not only acts of violence but also threats to commit violence or do harm. Workplace violence includes any conduct, verbal or physical, in-person or virtual, which causes another to reasonably fear for their own personal safety or that of their immediate family.

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

RESPONSIBILITIES

WVPP Administrator

The WVPP Administrator has the authority and responsibility for implementing the provisions of the WVPP in collaboration with related departments and brand affiliates.

The WVPP Administrator or designee has overall responsibility for investigating each incident, conducting post-incident analysis and corrective action determination, documenting the incident and findings in respective logs, and disseminating corrective actions and updates to the WVPP.

Departmental/Brand Support

Departments, including but not limited to, Legal, and Compliance, Training, Human Resources, Operations, and designated Brand personnel, are also responsible for supporting and maintaining the WVPP.

Departmental staff and designated Brand personnel are responsible for assisting the WVPP Administrator in incident investigation, corrective action determination, and WVPP annual review and timely updates.

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Management

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

Managers and supervisors are responsible for providing a secure work environment for their staff, including the identification of security risks, staff training needs, the development and management of security policies and procedures, and incident reporting, investigation, and follow up.

Supervisors are responsible for coordinating the completion of the Violent Incident Report with the affected employee before submitting for investigation and Violent Incident Log completion.

Employees

All employees are responsible for reporting hazards and injury or illness incidents including hazards and incidents related to workplace violence.

Employees are required to complete workplace violence training, as assigned. Employees must feel comfortable identifying a violence issue and elevating it for attention and support. Employees, once aware of violence, are encouraged to report any threats or acts of workplace violence within 24 hours or as soon as reasonably possible from time of knowledge of the incident. Employees must be able to inform management about workplace hazards or threats of violence without fear of reprisal or adverse action.

Employees shall refer any questions regarding their rights and obligations under this Plan to their immediate supervisor.

Assigned Responsibilities:

Responsible persons assisting with oversight and administration of the WVPP are listed below:

Responsible Persons	Department	WVPP Responsibility(ies)
Marc Bonora General Counsel, Chief Compliance Officer Email: compliance@ingenovishealth.com	Legal & Compliance	WVPP Administrator Overall responsibility for the WVPP <i>Approves the final Plan and any major changes.</i>
Marc Bonora General Counsel, Chief Compliance Officer Email: compliance@ingenovishealth.com Jeff Lynch SVP of Operations & Compliance Email: compliance@ingenovishealth.com	Legal & Compliance, & designated Brand personnel	Emergency response, hazard identification, & coordination with other employers <i>Coordinates emergency response procedures and communicates with other employers about the plan.</i>
Natalie McKenna Reilly Dir. Of Insurance & Risk Management Email: compliance@ingenovishealth.com	Risk Management, Training, HR, & designated Brand personnel	Employee Training and Violence Reporting <i>Updates training materials, handles workplace violence reports, coordinates safety follow-up.</i>

EMPLOYEE INVOLVEMENT

Ingenovis Health encourages employee engagement in the development, training, and monitoring of the WVPP. Employees are expected to actively engage and participate in the investigation and correction process.

Employees can participate by:

- Attending WVPP/safety meetings or equivalent, as scheduled, and available.
- Sending comments and feedback to their supervisor, HR or directly to Ingenovis Compliance at compliance@ingenovishealth.com.
- Identifying and promptly reporting hazards and unsafe conditions.
- Completing assigned training.
- Participating in post-incident investigations including completion of a Violent Incident Report form as required.
- Complying with any corrective actions identified to address and reduce future risk of recurring hazards.
- Follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment.

Management will ensure that all workplace violence policies and procedures within this Plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.

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

Employees are required to comply with the rules and work practices that are designed to make the workplace more secure, and not engage in threats or physical actions which create a security hazard for others in the workplace. Procedures to assist with these compliance efforts, include at a minimum:

- Training employees, supervisors, and managers in the provisions of Ingenovis Health's Workplace Violence Prevention Plan (WVPP).
- 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.
- Discipline employees for failure to comply with the WVPP in accordance with Ingenovis Health's disciplinary policies and procedures. Employees who fail to comply with the WVPP may be subject to disciplinary actions up to and including termination of employment.

COMMUNICATION

Ingenovis Health recognizes 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. Communication 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. This can include reinforcing a culture that encourages reporting of violence incidents without fear of retaliation,

addressing employee concerns around violence, and any post-incident investigations yielding corrective actions that could reduce violent incidents. The vehicle of communication can be in-person, or virtual, and can include staff meetings, newsletters, town hall gatherings, or staff bulletins. Ongoing communications can be met via regularly scheduled meetings, newsletters, emails, text messages or bulletins. These communications also serve to bring timely updates to employees when changes in processes have been identified after a violent incident investigation to prevent future episodes.

COORDINATION WITH OTHER EMPLOYERS

Ingenovis Health 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 either through their assigned placement facility or the Company.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- Sharing training materials and incident reports with other employers to ensure a coordinated response to any incidents. This could involve sending copies of training materials and incident reports to other employers.

At a multiemployer worksite, the employer whose employees experience a workplace violence incident will be responsible for recording the information in a violent incident log and shall also provide a copy of that log to the controlling employer.

EMERGENCY RESPONSE PROCEDURES

Appropriate elevation and response need to be determined at the time of the incident, whether it is an in-person event or a threat of future harm. With any incident, employee safety is of the highest importance.

Elevation and response mechanisms can include the employee leaving the area, calling for help, or, with a more imminent threat, calling 9-1-1. The employee must share the specifics of the violent incident with a supervisor/manager/other leader and the onsite supervisor if employees are on assignment at the time of the incident.

Ingenovis Health will alert employees of the presence, location, and nature of workplace violence emergencies through text messages, emails and/or phone calls, as appropriate.

In the event of a Workplace Violence emergency:

- Obtain help from staff, security personnel, or law enforcement.
- If there is immediate danger, call for emergency assistance by dialing 9-1-1, notify the supervisor and on-site supervisor.
- Contact the following to coordinate and initiate emergency response:

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Responsible Persons	Department	WVPP Responsibility(ies)
Marc Bonora General Counsel, Chief Compliance Officer Email: compliance@ingenovishealth.com Jeff Lynch SVP of Operations & Compliance Email: compliance@ingenovishealth.com Ingenovis Legal & Compliance Email: compliance@ingenovishealth.com	Legal & Compliance, & designated Brand personnel	Emergency response, hazard identification, & coordination with other employers <i>Coordinates emergency response procedures and communicates with other employers about the plan.</i>

- Follow all instruction and communications from on-site personnel, as appropriate, related to evacuation and/or sheltering plans, and look for the closest and safest exit to access, where possible.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURES

Employees can report threats, hazards, incidents, acts and/or concerns of workplace violence to their supervisor, HR, the WVPP Administrator, or through the Company’s Compliance Hotline as listed below. The Compliance Hotline is available 24/7 to ensure easy access, confidentiality and anonymity.

Workplace Violence Reporting Hotline/Compliance Hotline:

Toll Free: (833) 246-0128

Online: https://secure.ethicspoint.com/domain/en/default_reporter.asp

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. Consistent with the Company’s **Non-Retaliation Policy** [IGV-HR-POL-0120], employees who retaliate may be subject to disciplinary action up to and including termination of employment.

VIOLENT INCIDENT LOG COMPLETION

As required by [California Labor Code section 6401.9](#) a violent incident log must be completed following each reported incident.

Supervisors and/or designated Brand personnel should complete the Violent Incident Log with the details required, and forward to Ingenovis Health Compliance at compliance@ingenovishealth.com after completion of the investigation. [See attached Violent Incident Log]. The Ingenovis Compliance team can assist with Log completion, as necessary.

When completing the Log, ensure that no personal identifying information is recorded or. 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. Identifying an incident number instead of employee names allows tracking while protecting confidentiality.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WVPP Administrator or their designee will initiate an investigation of the

incident and implement post-incident procedures.

Incidents occurring at an external worksite location may require collaboration, assistance, and permission from facility personnel in investigating and implementing some or all of the post-incident procedures.

Post-incident procedures may include but are not limited to the following:

- 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 and accessible.
- 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(s) to prevent similar incidents from occurring.
- Record the findings and ensuring corrective actions are taken.
- Obtain any reports completed by law enforcement.
- Complete the Violent Incident Log to record every workplace violence incident.
- Review all previous incidents.

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner.

The ongoing reporting and tracking of violent incidents will assist in the identification of trends and the potential for hazard reduction or mitigation. Hazards that are identified with potential solutions will be addressed and implemented in a timely manner. Corrective actions deemed significant by incident severity and frequency may require an update and modification to the current WVPP. Employees will receive timely notification and training of all WVPP updates as required.

Ingenovis Health will implement effective procedures to correct workplace violence hazards that are identified. Corrective actions may include but not be limited to the following:

- 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.
- All corrective actions taken will be documented either in the Incident Investigation Report, Violent Incident Report or electronically, through the Company's hotline investigation platform.
- Corrective measures for workplace violence hazards may be specific to a given work area.

Examples of corrective measures for consideration include:

- Improve lighting around and at the workplace.
- Utilize surveillance measures, such as cameras and mirrors, to provide information on what is going on outside and inside the workplace and to dissuade criminal activity.
- Implement security measures, as appropriate, to include:

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- ▶ Security cameras.
- ▶ Security guards and patrols in the workplace interior and perimeter.
- ▶ Enhanced or additional door and window locks, physical barriers, emergency alarms.
- ▶ Visitor identification checks and check-in procedures.

- 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.

- Ensure that employee disciplinary and discharge procedures address the potential for workplace violence.

- Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence. Through training and retraining as needed.

- 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 communications between managers and employees.

 - ▶ Procedures for reporting suspicious persons, activities, and packages.

 - ▶ Provide/review employee, supervisor, and management training on emergency action procedures.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

Ingenovis Health will ensure that workplace violence hazards are identified and evaluated through a review of all submitted/reported concerns of potential hazards as well as performing inspections including post-incident, following notification of a new or previously unrecognized hazard, or periodically.

PERIODIC INSPECTIONS

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. Periodic inspections to identify and evaluate workplace violence and hazards will be performed as identified by designated personnel either at the Ingenovis and/or Brand level and in cooperation with facility personnel, as permitted.

Inspections for workplace violence hazards may include assessing any of the following:

- Entry into the workplace by exterior and interior access points.
- The need for violence surveillance measures, such as mirrors and cameras.
- Procedures for employee response during a criminal act, including refraining from confronting violent persons or persons committing a criminal act, where possible to avoid the risk of greater injury.
- 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.
- 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 the 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.

TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will have training and instruction on workplace violence practices. Training and instruction will be provided in compliance with [California Labor Code section 6401.9](#) and will occur as follows:

- When the WVPP is first established.
- When new employees are placed on assignment in California, if training has not already been provided.
- 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.

EMPLOYEE ACCESS TO THE WRITTEN WVPP

Ingenovis Health 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.

- Employees have unobstructed access to the WVPP through the Company's intranet or equivalent site, which allows the employee to review, print, and email the current version of the written

WVPP.

- Employees or designated representatives may also request a copy of the WVPP from the Ingenovis Health Legal & Compliance Team at compliance@ingenovishealth.com.
- Whenever an employee or designated representative requests a copy of the written WVPP, Ingenovis Health will provide the requester with an electronic copy of the WVPP, unless the requester requests a printed copy.

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 fifteen calendar days of a request:

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

RECORDKEEPING

Ingenovis Health 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.
 - Training title, content, or a summary of the training sessions.
 - Method of training provided (*i.e., assigned courses through the Company's Learning Management Platform(s), in person training, etc.*) and if instructor led training, the name(s) and job title(s) of the person(s) 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 [California Labor Code section 6401.9\(f\)](#), shall be made available to Cal/OSHA upon request for examination and copying.

REVIEW AND REVISION OF THE WVPP

The Ingenovis Health WVPP will be reviewed:

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

Review of Ingenovis Health's WVPP should include, but is not limited to:

- Review of incident investigations and the violent incident log.

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- Review that violence risks are being properly identified, evaluated, and corrected.
- Review of corrective actions to ensure monitoring and compliance as required.

Updates to the WVPP will be communicated to employees, incorporated into WVPP training materials and training reassigned, as required.

EMPLOYER REPORTING RESPONSIBILITIES

As required by [California Code of Regulations \(CCR\), Title 8, Section 342\(a\). Reporting Work-Connected Fatalities and Serious Injuries](#), Ingenovis Health 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.

WVPP RESOURCES

For questions, inquiries and/or additional information about the Ingenovis Health WVPP please contact Ingenovis Health Legal & Compliance at compliance@ingenovishealth.com or contact the WVPP Administrator.

WVPP UPDATES:

Implementation Date: July 1, 2024

Date of Last Review: N/A

Date of Last Revision(s): N/A