

CALIFORNIA WORKPLACE VIOLENCE PREVENTION PLAN

Adopted on July 1, 2024 by CrossCountry Mortgage, LLC
Pursuant to California Labor Code Section 6401.9.

A. APPLICABILITY AND IMPLEMENTATION

1. The Workplace Violence Prevention Plan (“plan”) aims to protect employees from aggressive and violent behavior in the workplace. This plan is applicable to the following workplace [OR work area OR operation]:

All CrossCountry Mortgage, LLC (“CrossCountry”) Branch Office locations in California, excludes employees who are classified as remote in CrossCountry’s HRIS.

2. The following individuals are responsible for implementing the plan:

Michelle Novak
EVP of Human Resources
Description of role in the plan: Plan Implementation and Emergency Response Team Leader
Direct phone: 440-262-3895
E-Mail: Michelle.Novak@ccm.com

Rebecca Medina
HR Benefits Manager
Description of role in the plan: Plan Administration
Direct phone: 216-340-7332
E-Mail: Rebecca.Medina@ccm.com

3. The plan is accessible to employees and authorized employees representatives.

The plan is available in various locations:

- CrossCountry’s Intranet “The Landing”: <https://thelanding.ccm.com>
- Benefits Website: <https://mycrosscountrybenefits.com>

B. WORKPLACE VIOLENCE DEFINED

1. Workplace violence means 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:
 - a. 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.

- b. 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.
- c. The following four workplace violence types:
 - i. “Type 1 violence,” which means 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.
 - ii. “Type 2 violence,” which means workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
 - iii. “Type 3 violence,” which means workplace violence against an employee by a present or former employee, supervisor, or manager
 - iv. “Type 4 violence,” which means 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.

C. ACTIVE EMPLOYEE INVOLVEMENT

- 1. CrossCountry obtains the active involvement of employees and authorized employee representatives in developing and implementing the plan. CrossCountry involves employees 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.

Designated onsite branch manager and other employees as included by branch manager to complete the Workplace Violence Hazard Assessment Form for their location(s), completed form to be returned to Human Resources. Designated individual(s) onsite at branch location are required host quarterly safety meetings, which can include site Property Management as applicable. Human Resources will distribute the Workplace Violence Hazard Assessment Form via email attachment or online survey platform. This procedure will occur at the beginning of plan adoption and annually thereafter, or when a deficiency is observed or becomes apparent, and after a workplace violence incident.

D. COORDINATION WITH OTHER EMPLOYERS

- 1. CrossCountry will coordinate implementation of the plan with other employers, when applicable, to ensure that those employers and employees understand their respective roles, as provided in the plan.

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

Designated onsite branch manager is responsible for disclosing such an arrangement or circumstance as it relates to other employer(s) with the abovementioned individuals responsible for implementing the plan. Joint meeting to take place and appropriate next steps to be taken, if applicable.

E. COMMUNICATION, REPORTING, AND RESPONSE TO WORKPLACE VIOLENCE

1. CrossCountry’s system for communicating the plan and workplace violence matters. CrossCountry implements this plan in a form readily understandable by employees that suits our culture, technology, methods, and workplaces.

In addition to this information, our Company has a written Emergency Response Plan for branch office locations, which is located on CrossCountry’s Intranet “The Landing”: <https://thelanding.ccm.com>.

3. CrossCountry accepts and responds to all reports of workplace violence. Employees can report a violent incident, threat, or other workplace violence concern to CrossCountry or law enforcement.

Methods are as follows, including but not limited to:

- Local law enforcement or dial 911 depending on severity of threat.
- Employee’s direct manager.
- Property Management, as applicable.
- CrossCountry Human Resources:

Michelle Novak
EVP of Human Resources
Direct phone: 440-262-3895
E-Mail: Michelle.Novak@ccm.com

Rebecca Medina
HR Benefits Manager
Direct phone: 216-340-7332
E-Mail: Rebecca.Medina@ccm.com

4. CrossCountry strictly prohibits any retaliation against any employee who reports workplace violence. Any employee who believes they have experienced retaliation due to reporting workplace violence should contact:

Employees are expected to report it immediately to their direct manager, the EVP of Human Resources, and/or the Legal Department so CrossCountry may conduct a thorough investigation. CrossCountry takes all complaints and concerns seriously, which will be handled promptly. If the concern is about a manager, or if it seems more appropriate to the employee, he or she may contact the EVP of Human Resources. Employees can raise concerns, make reports or participate in an investigation without fear of reprisal or retaliation of any kind. Anyone found to be engaging in any type of unlawful discrimination or retaliation will be subject to disciplinary action, up to and including termination of employment.

F. COMPLIANCE WITH PLAN

1. All employees must comply with the plan. CrossCountry ensures that all supervisory and nonsupervisory employees comply with the plan. Failure to comply with the plan could result in discipline, up to and including termination.

Employees must immediately report any violent incidents and/or workplace violence hazards. Employees who violate the plan, who cause hazardous or dangerous situations or who fail to report or, where appropriate, remedy such situations, may be subject to corrective action up to and including termination. Corrective action can include additional training or retraining as appropriate.

G. POST-INCIDENT RESPONSE AND INVESTIGATION PROCEDURES

1. CrossCountry responds and investigates all reports of workplace violence, workplace violence incidents, and/or employee concerns about workplace violence.
 - a. CrossCountry has procedures in place to investigate reports of workplace violence in its workplace.

Employees to disclose all relevant information when making a report of workplace violence incident to their direct manager, the EVP of Human Resources, and/or the Legal Department so CrossCountry may conduct a thorough investigation. Human Resources will log the incident formally and in conjunction with other applicable parties will investigate such reports. Investigation to be thorough, impartial, and confidential to the extent possible.

- b. CrossCountry will inform employees of the results of investigation and any corrective actions taken.

Human Resources will follow up directly with applicable parties in writing via email.

H. EMERGENCY RESPONSE

1. CrossCountry responds to actual or potential workplace violence emergencies.

- a. CrossCountry has procedures to alert employees to the presence, location, and nature of workplace violence emergencies.

Verbal communication from onsite management will alert employees to workplace violence emergencies.

- b. CrossCountry has procedures for evacuation or sheltering that are appropriate and feasible for the worksite.

All employees must be familiar with the location of emergency exits. Employees must also be familiar with appropriate responses that are to be taken in the event of a building evacuation. If you are advised to evacuate the building, you should:

- Stop all work immediately.
- Contact outside emergency response agencies, if needed.
- Shut off all electrical equipment and machines, if possible.
- Walk to the nearest exit, including emergency exit doors.
- Exit quickly, but do not run. Do not stop for personal belongings.
- Proceed, in an orderly fashion, to a parking lot near the building. Be present and accounted for a possible roll call. Do not re-enter the building until instructed to do so.

- c. CrossCountry has procedures for employees to obtain help from staff assigned to respond to workplace violence emergencies [such as security personnel or law enforcement, if applicable].

Methods are as follows, including but not limited to:

- Local law enforcement or dial 911 depending on severity of threat.
- Employee's direct manager.
- Property Management, as applicable.
- CrossCountry Human Resources:

Michelle Novak
EVP of Human Resources
Direct phone: 440-262-3895
E-Mail: Michelle.Novak@ccm.com

Rebecca Medina
HR Benefits Manager
Direct phone: 216-340-7332
E-Mail: Rebecca.Medina@ccm.com

I. TRAINING PROCEDURES

1. CrossCountry provides effective training on the plan to all employees. The training will be provided when the plan is first established, and annually thereafter. The training consists of the following.

- a. The plan, how to obtain a copy of the plan at no cost, and how employees participate in development and implementation of the plan;
- b. The definitions and requirements contained in Labor Code Section 6401.9;
- c. How employees can report workplace violence incidents or concerns to CrossCountry or law enforcement without fear of reprisal;
- d. Workplace violence hazards specific to the employees' jobs, the corrective measures CrossCountry has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm;
- e. The violent incident log (described in Section M) 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. WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

- 1. CrossCountry identifies and evaluates workplace violence hazards.
 - a. CrossCountry conducts inspections as needed to identify unsafe conditions, work practices, and employee reports or concerns related to workplace violence and to ensure compliance with employer's workplace violence prevention policies and procedures. Inspections are conducted when the plan is first established, after each workplace violence prevention incident, and whenever CrossCountry is made aware of a new or previously unrecognized hazard. The following individual maintains records of these inspections:

Rebecca Medina
HR Benefits Manager
Direct phone: 216-340-7332
E-Mail: Rebecca.Medina@ccm.com

K. CORRECTION OF WORKPLACE VIOLENCE HAZARDS

- 1. CrossCountry corrects identified workplace violence hazards.
 - a. CrossCountry's correction of workplace violence hazards are implemented with effective policies and/or procedures for correcting unsafe or unhealthy conditions, work practices, policies, and procedures in a timely manner based on the severity of the hazard.

Human Resources will log the incident formally and in conjunction with other applicable parties will investigate such reports. Investigation to be thorough, impartial, and confidential to the extent possible. Corrective actions may include but not limited to reassessment of location and potential hazards (i.e., Workplace Violence Hazard Assessment Form), additional training/retraining, and/or updates to the plan and training as applicable.

L. REVIEW OF PLAN EFFECTIVENESS

1. CrossCountry will review the effectiveness of the plan and revise 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.
2. CrossCountry will obtain the active involvement of employees and authorized employee representatives in reviewing the plan.

Designated onsite branch manager and other employees as included by branch manager to complete the Workplace Violence Hazard Assessment Form for their location(s), completed form to be returned to Human Resources. Designated individual(s) onsite at branch location are required host quarterly safety meetings, which can include site Property Management as applicable. Human Resources will distribute the Workplace Violence Hazard Assessment Form via email attachment or online survey platform. This procedure will occur at the beginning of plan adoption and annually thereafter, or when a deficiency is observed or becomes apparent, and after a workplace violence incident.

M. VIOLENT INCIDENT LOG

1. CrossCountry will record information in a violent incident log for every workplace violence incident. The log shall include all of 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 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.

N. RECORD KEEPING

1. CrossCountry will create and maintain the following records:
 - a. Records of workplace violence hazard identification, evaluation, and correction.
 - b. Training records.

- c. Violent incident logs.
- d. Records of workplace violence incident investigations.

O. EMPLOYEE ACKNOWLEDGEMENT

To ensure that your understanding of our workplace violence prevention plan is as complete as possible, please do not hesitate to contact Rebecca Medina, HR Benefits Manager, Rebecca.Medina@ccm with any questions, comments, or suggestions.

Please acknowledge your understanding of the Workplace Violence Prevention Plan by electronic acknowledgement available and required within CrossCountry's Learning Management System (LMS). This acknowledgment also constitutes your express agreement to abide by the workplace violence prevention plan policies at all times.