



WORKPLACE VIOLENCE PREVENTION POLICY

Effective Date: 08/01/2026

PURPOSE

ATC or 'Company' is committed to providing a safe work environment free from intimidation, threats or violence. This includes, but is not limited to, intimidating or threatening behaviors, physical or verbal abuse, carrying or use of weapons in ATC facilities or in the course of employment, or any other actions which could reasonably be perceived as threatening, abusive, and/or could cause injury. This policy applies to all ATC facilities, Company-related settings, and Company-sponsored social events.

ATC needs the help of all Covered Workers to identify prohibited conduct and recognize potential warning signs of intimidating, threatening, or violent behavior. As the first line of defense, if you 'see something, say something' to potentially help prevent abusive behavior and workplace violence.

SCOPE

This policy applies to all Covered Workers.

DEFINITIONS

Covered Workers – employees, contingent workers and contractors.

Prohibited Conduct – Prohibited conduct against employees, contingent workers, contractors, visitors, or customers includes, but is not limited to, the following:

- Injuring another person physically
- Bullying and/or stalking another person physically, emotionally, or electronically
- Engaging in behavior that creates a reasonable fear of injury in another person
- Engaging in behavior that subjects another person to extreme emotional distress
- Intentionally damaging property
- Threatening to injure an individual or damage property
- Retaliating against any person reporting a perceived workplace violence incident
- Deliberately reporting false or misleading claims of violence with the intention to harass or that appear to be an abuse of the reporting process
- Carrying, possessing, brandishing, or using a weapon while in ATC facilities (i.e. office building, substation control house, contracted facility, jointly owned facilities, etc.).
 - Firearms and weapons are strictly prohibited from Company property (see exceptions/violations section below)
 - Employees are also strictly prohibited from carrying firearms or weapons while they are in the course of their employment, regardless of whether they are on Company property or at a location where firearms or weapons are otherwise allowed
 - This restriction during the course of employment includes any location where Company business is conducted

The examples describing Prohibited Conduct are not exhaustive. The absence of any Prohibited Conduct from this list does not mean the conduct is appropriate. The Company retains the right and discretion in all situations to discipline any employee it finds having engaged in Prohibited Conduct, regardless of whether the conduct is specifically described above.

RESPONSIBILITIES

Workers are responsible for:

- Understanding and being aware of potential warning signs of violence. Workplace violence can start as small incidents involving negative remarks and inappropriate behavior. It may escalate to physical or psychological violence.
- It is much easier to prevent violence by stopping small incidents than trying to deal with the aftermath of a major crisis. It is important to understand that the following behaviors do not mean a person will become violent, but they may indicate the person is experiencing high levels of stress.
- Each situation is unique and professional judgement or outside assistance may be necessary to determine if intervention is necessary.
- Always take note and report observations if there is a change in the person's behavior patterns, specifically if the frequency and intensity of the behaviors are disruptive to the work environment, and the person is exhibiting one or more of these behaviors:

Increasingly erratic, unsafe, or aggressive behaviors; severe mood swings	Marginalization, distancing, or known stressors in relationships with friends or colleagues	Escalation of domestic problems into the workplace; talk of severe financial problems
Hostile feelings of injustice or perceived wrongdoing	Changes in performance at work; repeated violations of Company policies	Talk of pending civil or criminal litigation
Drug and alcohol abuse	Suicidal; comments about "putting things in order"	Observable grievances with threats and plans of retribution
Noticeable decrease in attention to appearance, hygiene	Unexplained increase in absenteeism; inexplicable injuries	Explosive outburst of anger or rage without provocation
Talk of previous incidents of violence	Empathy for individuals committing violence	Increase in unsolicited comments about firearms, other dangerous weapons, violent crimes

- Immediately withdrawing and retreating to a location of safety if they are confronted or observe a person whose actions or words are reasonably perceived as physically threatening or intimidating.
- Promptly reporting any incurred and/or observed Prohibited Conduct or warning signs to direct manager, human resources, legal, corporate security, or by calling 911 in an emergency.
- Cooperating fully in investigations/assessments of allegations of workplace violence.
- When faced with situations that may lead to violence in the workplace, partnering with human resources to create a plan to increase safety and security while at work. This includes notifying human resources about restraining or protective court orders that list the workplace as a protected area. Plans will be created in such a way as to maintain confidentiality to the extent reasonable under the circumstances.

ATC leaders are responsible for:

- Being cognizant of situations that have the potential to produce violent behavior and promptly addressing or reporting them.
- Encouraging Workers who show potential warning signs to seek assistance, such as through the Employee Assistance Program.
- Assuring, where needed, that employees have time and opportunity to attend support programs and/or external training to help mitigate stressors (e.g., conflict resolution, stress management).
- Notifying human resources when potential warning signs are observed or reported.
- Working with human resources, legal, security, and/or law enforcement to take appropriate actions to reduce the risk of workplace violence.

Corporate Security is responsible for:

- Helping defuse violent situations.
- Providing technical advice and support regarding physical security matters.
- Immediately investigating any reported violence, intimidation, or threats involving ATC employees in conjunction with appropriate human resources personnel and/or law enforcement.
- Acting as a liaison with local authorities and outside law enforcement agencies.

Human Resources is responsible for:

- Providing consultation to Covered Workers determining the appropriate course of action for Covered Workers who exhibit potential warning signs.
- In conjunction with appropriate security personnel and/or law enforcement, immediately investigating any reported violence, intimidation, or threats involving ATC employees.
- Conducting investigations in the most confidential manner feasible, given the circumstances.
- Involving and partnering with appropriate stakeholders.

REPORTING

It is the responsibility of all ATC employees to report any suspected violations of this policy, in accordance with ATC's Open Door Policy.

NON-RETALIATION

ATC strictly prohibits retaliation in any way against anyone who has honestly made a report or complaint, expressed a concern about inappropriate conduct or cooperated in an investigation. Disciplining or otherwise disadvantaging an individual because they in good faith reported a potential concern or cooperated in an investigation is, itself, a violation of ATC policy.

EXCEPTIONS/VIOLATIONS

Employees may store concealed weapons in their personal vehicle under the following circumstances:

- They are properly licensed to carry concealed weapons in their state of residence
- They are legally permitted to possess weapons for hunting or recreational purposes

The weapons and/or ammunition referenced above must meet the following criteria:

- Remain locked and secured in the employee's personal vehicle while on Company property or at any time the employee is conducting Company business
- Remain concealed while in the employee's personal vehicle at all times (i.e., indiscernible from the ordinary observation of a person located outside and within the immediate vicinity)
- A small pocket-knife is permissible and may be carried and/or stored on Company premises, as long as the blade is 3 inches or less in length,

Further exceptions to this policy require the approval of the Policy Owners listed above. Employees who violate this policy are subject to disciplinary action, up to and including termination.