



Employee Relations Leadership Guide

Purpose

This guide is intended to:

- improve consistency in employee relations practices,
- strengthen documentation quality,
- clarify when HR involvement is required,
- and help leaders navigate workplace concerns appropriately and professionally.

These guidelines are intended to support leadership decision-making but are not rigid rules. Every situation is unique, and HR reserves discretion to evaluate circumstances individually based on:

- risk,
- severity,
- business impact,
- consistency,
- operational realities,
- and applicable legal considerations.

Section 1 – FIRAC Documentation Guidance

The Company utilizes the FIRAC framework to improve corrective action and investigation documentation consistency.

FIRAC is intended to create clearer, more consistent documentation by helping leaders separate objective facts from assumptions, identify the actual issue being addressed, connect concerns back to policy or operational expectations, explain the business or team impact, and clearly document the final conclusion or accountability action being taken. The goal is to improve documentation quality, coaching consistency, and overall clarity while reducing vague, emotional, or unsupported corrective action language.

F — Facts

Document:

- objective observations,
- dates/times,
- behaviors,
- witnesses,
- evidence reviewed,
- prior coaching.

Avoid:

- assumptions,
- exaggeration,
- emotional language,
- opinions.

Example

BAD: Employee had a terrible attitude and was clearly trying to start problems.

BETTER: Employee raised voice during coaching discussion on 5/12/26 and refused instruction to complete assigned closing tasks.

I — Issue

Clearly identify:

- the policy concern,
- conduct issue,

People. Performance. Partnership.

Confidential – HR Use Only





- or performance problem.

Example

BAD: *Employee is disrespectful.*

BETTER: *Employee failed to follow leadership direction and engaged in unprofessional workplace communication.*

R — Rule

Identify:

- policy,
- expectation,
- SOP,
- or operational standard.

Example

BAD: *Employee should know better.*

BETTER: *Company expectations require employees to communicate professionally and follow reasonable leadership instruction.*

A — Analysis

Explain:

- operational impact,
- team impact,
- customer impact,
- safety concerns,
- leadership concerns,
- or pattern behavior.

Example

BAD: *This behavior is unacceptable and makes everyone mad.*

BETTER: *Failure to follow instruction disrupted operations, created inconsistency within the team, and required another employee to complete assigned responsibilities.*

C — Conclusion

Document:

- corrective action issued,
- expectations moving forward,
- timeline for improvement,
- and consequences if improvement does not occur.

Example

BAD: *If this keeps happening you're gone.*

BETTER: *Employee is being issued a Written Warning. Immediate and sustained improvement in professionalism, communication, and compliance with leadership direction is expected moving forward. Failure to improve may result in additional corrective action, up to and including termination of employment.*





Section 2 – Documentation Do's & Don'ts

DO:

- Document observable behavior
- Be factual and specific
- Include dates/times/examples
- Reference policies or expectations
- Separate facts from conclusions
- Remain professional and objective

DO NOT:

- Use emotional language
- Diagnose intent or motivation
- Use labels or character attacks
- Exaggerate conduct
- Include speculation or gossip

Examples

Avoid	Use Instead
"Lazy"	"Failed to complete assigned tasks by required deadline"
"Aggressive"	"Raised voice and interrupted repeatedly during discussion"
"Bad attitude"	"Refused instruction and left conversation before completion"
"Unprofessional"	"Used profanity during customer interaction"
"Emotional"	"Cried during discussion and left meeting"





Section 3 – Retaliation Awareness Guidance

Retaliation occurs when an employee experiences negative treatment, adverse action, or changes in working conditions because they raised a concern, participated in an investigation, reported misconduct, or engaged in legally protected activity. Retaliation can be direct or subtle and may include changes in treatment, scheduling, discipline, communication, or workplace interactions following an employee's involvement in a complaint or investigation process.

The Company strictly prohibits retaliation in any form and expects leaders to exercise heightened awareness and professionalism when managing employees involved in employee relations matters.

Examples of Potential Retaliation

Example

Reducing hours after a complaint
Isolating an employee
Sudden increase in discipline
Excluding employee from meetings
Schedule changes without business justification
Negative treatment following participation in investigation
Threats or intimidation
Increased scrutiny inconsistent with prior treatment

Leadership Expectations

Leaders should:

- maintain professionalism,
- avoid discussing investigations unnecessarily,
- consult HR before issuing discipline involving a reporting employee,
- and immediately report retaliation concerns to HR.





Section 4 – Workplace Investigation FAQ

Why does HR investigate workplace concerns?

HR investigates workplace concerns to gather facts, assess compliance with company policy and expectations, ensure consistency in how concerns are handled across the organization, reduce organizational and legal risk, and help maintain a respectful, professional, and safe work environment for employees.

Why can't HR share all details?

Investigations involve confidential employment information and privacy considerations. HR shares information on a need-to-know basis.

Why does HR sometimes ask multiple people the same questions?

Consistency and corroboration are important parts of a fair investigation process.

Why does HR sometimes ask the same question more than once or in several different ways?

HR may revisit the same topic or ask similar questions in different ways to ensure clarity, consistency, and accuracy throughout an investigation. This helps identify misunderstandings, clarify timelines, assess consistency between accounts, and ensure important details are not missed.

In some situations, employees may initially feel uncomfortable, nervous, or hesitant to fully explain concerns, so investigators may reframe or revisit questions to help create a more comfortable environment for discussion and ensure employees have an opportunity to fully share relevant information.

Follow-up questioning is a normal part of the investigative process and should not be interpreted as an assumption of wrongdoing or an attempt to pressure someone into providing a specific answer.

What does the typical HR investigation process look like?

While every situation is different and some concerns may be resolved more informally than others, most employee relations investigations generally follow a consistent process. The process typically begins with intake, where a concern is reported and initially assessed. HR then evaluates the overall risk level, determines whether escalation or interim actions are necessary, and begins gathering information through interviews, documentation review, and evidence collection as appropriate.

Once information is collected, HR evaluates the facts, credibility, policy considerations, and overall context of the situation before determining findings and any appropriate operational response. Depending on the outcome, this may include coaching, corrective action, additional follow-up, or other workplace interventions. After resolution, HR may continue monitoring for retaliation concerns or additional issues before formally closing the matter.

Are all investigations formal?

No. Some matters are resolved quickly and informally, while others require more extensive investigation and documentation.

What if I'm unsure whether something is serious enough to report?

When uncertainty exists, involve HR early. It is always preferable to assess a situation proactively rather than wait until concerns escalate further. HR can help determine the appropriate level of response, documentation, and escalation.

What if an employee tells me something "in confidence" and asks me not to report it?

Leaders should never promise complete confidentiality regarding workplace concerns. If a concern involves potential policy violations, harassment, discrimination, retaliation, safety concerns, threats, ethics





issues, or other elevated employee relations risks, leaders have an obligation to involve HR even if the employee requests otherwise.

What if I witness concerning behavior outside of my direct department or reporting structure?

Leaders are expected to report significant workplace concerns regardless of reporting lines or operational ownership. Concerns involving safety, harassment, discrimination, retaliation, threats, ethics concerns, or serious policy violations should always be escalated to HR even if the employees involved are not within your direct area of responsibility.

What if an employee says they “don’t want HR involved”?

Employees do not determine whether HR involvement is required. While HR will always consider employee concerns and preferences when possible, the Company may still have an obligation to review and address concerns involving policy compliance, workplace safety, legal risk, or organizational impact.

Can leaders conduct investigations independently?

Routine operational conversations and coaching discussions may occur locally; however, HR should be involved whenever concerns involve harassment, discrimination, retaliation, threats, leadership misconduct, ethics concerns, final warnings, terminations, or situations involving elevated employee relations, legal, operational, or reputational risk.

What if I already handled the issue myself before contacting HR?

Leaders are encouraged to involve HR early in elevated employee relations situations. While operational coaching may occur locally, corrective action decisions, investigations, employee separations, or significant workplace concerns handled without HR involvement can create consistency, documentation, operational, and legal risk.

Should I document verbal coaching conversations?

Yes. Leaders are encouraged to document meaningful coaching conversations, performance concerns, operational issues, and employee relations discussions to help ensure consistency, accountability, and clarity moving forward. Documentation does not always mean formal corrective action.

What if an employee becomes emotional during a conversation?

Employees may respond emotionally during difficult conversations or investigations. Leaders should remain calm, professional, and objective while focusing on observable behavior and factual documentation.

Can I record conversations with employees?

Leaders should not independently record employee conversations without HR approval. Recording laws vary by state, and unauthorized recordings may create legal and employee relations concerns.

Why does HR ask leaders not to discuss an investigation?

Limiting unnecessary discussion helps protect the integrity of the investigation, maintain confidentiality to the extent possible, reduce retaliation concerns, and avoid influencing witness statements or employee perceptions.

What if an employee refuses to participate in an investigation?

Employees are expected to cooperate honestly and professionally in workplace investigations. While employees may decline to answer certain questions, the Company may still move forward with the investigation and make findings based on the information available.

Should I tell other employees someone is under investigation?

No. Leaders should avoid discussing investigations unnecessarily with employees who do not have a legitimate business need to know.





What if I disagree with HR's recommendation?

HR recommendations are intended to support consistency, compliance, and risk management across the organization. Leaders should discuss concerns openly with HR rather than independently deviating from guidance on elevated employee relations matters.

Why does HR sometimes move slower than operations would prefer?

HR investigations often require interviews, documentation review, evidence preservation, consistency review, leadership alignment, and legal or risk assessment. The goal is to ensure decisions are fair, consistent, defensible, and appropriately supported before action is taken.

Why does HR sometimes push back on termination recommendations for employees who have been ongoing problems?

HR is often evaluating not only whether termination may be justified, but whether the organization can consistently and objectively demonstrate why the decision was made. Without documentation, the organization may struggle to demonstrate that expectations were communicated, concerns were ongoing, or the employee was treated consistently compared to others.

What if a complaint seems minor or interpersonal?

Not every complaint results in a formal investigation or corrective action. Some concerns may involve coaching, communication improvement, mediation, or operational clarification.

What if an employee complains about unfair treatment but does not mention discrimination?

Leaders should still take concerns seriously and involve HR if there are indicators of inconsistent treatment, retaliation, favoritism, or potential policy concerns.





Section 6 – Leadership Accountability Expectations

Leaders are expected to model professionalism, maintain compliance with company policies and expectations, escalate concerns appropriately, participate honestly and professionally in investigations, and help support a respectful and accountable workplace culture.

Because leaders have greater operational influence, visibility, team impact, and organizational responsibility, leadership documentation and accountability standards are held to a higher standard than routine hourly employee documentation.

Any investigation, corrective action, final warning, or termination involving an SM or above must always be communicated directly to the RD regardless of AD involvement. Additionally, all hourly employee final warnings and terminations require AD involvement at minimum, with additional escalation occurring as appropriate based on risk, operational impact, or leadership concerns.





Section 7 – HR Contact & Escalation Guidance

Contact HR Immediately For:

Situation	HR Contact Recommended
Harassment concerns	☐
Discrimination concerns	☐
Retaliation concerns	☐
Threats, violence, or safety concerns	☐
Ethics complaints	☐
Wage & hour concerns	☐
Investigatory leave considerations	☐
Final warnings	☐
Terminations	☐
Leadership investigations or concerns involving SM+ employees	☐
Significant employee relations, operational, legal, or reputational risk	☐
Situations involving inconsistent treatment concerns	☐
Employee complaints involving fairness or favoritism concerns	☐
Situations where documentation may be insufficient or unclear	☐
Any situation where a leader feels uncomfortable, uncertain, or unsure how to proceed	☐

Leaders are encouraged to involve HR early whenever uncertainty exists. Even when concerns appear minor, HR can help assess risk, determine the appropriate level of response, ensure consistency, and help prevent situations from escalating unnecessarily.

Escalation Expectations

Situation	Escalation
Hourly final warning	HR & AD involvement required
Hourly termination	HR & AD involvement required
SM+ corrective action	HR & RD involvement required
Threats / violence	Immediate HR + RD escalation
Harassment / retaliation	HR escalation required
Legal threat / agency complaint	HR Leadership + Legal

Final Guidance

The goal of these standards is to create greater consistency, stronger documentation practices, and clearer alignment across the organization as we continue to grow. Employee relations situations are rarely identical, and leaders are expected to continue using sound judgment, professionalism, and operational awareness when addressing concerns within their teams. These resources are intended to provide guidance and support, not replace leadership discretion or partnership with HR.





Our objective is to ensure employee concerns are handled fairly, professionally, consistently, and in a way that protects both our employees and the organization. Strong documentation, timely escalation, and thoughtful leadership responses help create better outcomes operationally, strengthen accountability, and reduce unnecessary organizational risk. When uncertainty exists, leaders are encouraged to involve HR early so situations can be assessed collaboratively and handled appropriately from the beginning.

