



Employee Relations Investigation Policy

Purpose

WhiteWater is committed to maintaining a respectful, safe, and compliant workplace. The purpose of this policy is to establish consistent standards for reporting, investigating, documenting, and resolving employee relations concerns, workplace complaints, and potential policy violations.

This policy is intended to support prompt, fair, and thorough investigations; promote consistent investigative practices across the organization; ensure appropriate documentation and preservation of evidence; protect employees from retaliation related to reporting concerns or participating in investigations; and maintain compliance with applicable federal, state, and local employment laws.

Scope

This policy applies to all team members and governs workplace investigations involving concerns such as harassment, discrimination, retaliation, workplace violence or threats, safety concerns, policy violations, ethics concerns, misconduct, leadership behavior concerns, wage and hour matters, and other team member complaints that may impact workplace culture, operations, or compliance. This is not intended to be an exhaustive list, and the Company reserves the right to investigate any workplace concern or potential policy violation as deemed appropriate. This policy applies to all company-owned locations and all team members regardless of position, title, or length of service.

Definitions

Employee Relations (ER) Investigation: A structured review conducted by Human Resources to determine facts related to a workplace complaint, allegation, or policy concern.

Complainant: The individual reporting or raising a concern.

Respondent: The individual alleged to have engaged in misconduct or policy violations.

Witness: Any individual who may have relevant knowledge or information related to the investigation.

Evidence: Any documentation, communication, recording, photograph, video, schedule, or other information relevant to the investigation.

AI-Assisted Transcription: Company-approved transcription technology used to convert investigation interviews into written transcripts for documentation purposes.

Roles & Responsibilities

Function	Responsibilities
Human Resources	Lead investigations objectively and professionally; Maintain investigation documentation; Preserve confidentiality to the extent possible; Coordinate interviews and evidence collection; Make recommendations based on findings; Ensure compliance with company policy and employment laws
Managers / Field Leadership	Immediately escalate complaints to HR; Cooperate fully during investigations; Maintain confidentiality; Avoid retaliation or interference; Assist with operational support as needed
Team Members	Cooperate honestly in investigations; Provide truthful information; Maintain confidentiality when instructed; Report concerns promptly



Procedure

Reporting Concerns

Team Members may report workplace concerns through Human Resources, Company leadership, or designated email or phone reporting channels. HR can be contacted via email at hr@whitewatercw.com or by phone at 844.715.1250. Employees are encouraged to report concerns promptly so they may be reviewed and addressed appropriately. Any manager or member of leadership who receives a complaint or becomes aware of a potential policy violation is required to notify Human Resources immediately.

Investigation Standards

All investigations will be conducted as promptly as practicable and handled in an objective, professional, and consistent manner. Investigations will include appropriate documentation, witness interviews where applicable, and review of relevant evidence or supporting materials as necessary. The Company will maintain confidentiality to the extent possible while still allowing for a thorough and effective investigation process.

Recording & Transcription

The Company may utilize audio recording and AI-assisted transcription technology during investigations for documentation accuracy and quality assurance purposes. Team members participating in interviews will be informed when interviews are being recorded or transcribed.

Recordings and transcripts:

- Are confidential business records
- Must only be stored in approved company systems
- May only be accessed by authorized personnel
- Will be retained in accordance with company retention practices and litigation hold requirements

Personal AI tools or unauthorized recording methods are prohibited.

Retaliation Prohibited

Retaliation against any team member for reporting concerns, participating in an investigation, or providing information in good faith is strictly prohibited and may result in disciplinary action up to and including termination.

Corrective Action

Following completion of an investigation, the Company may implement corrective action as appropriate based on the findings of the investigation. Corrective action may include, but is not limited to, coaching, counseling, written warnings, performance improvement plans, schedule or reporting structure changes, or termination of employment. This is not intended to be an exhaustive list, and the level or type of corrective action will depend on the specific facts, circumstances, severity, and overall context of each situation.

Documentation & Records

Human Resources will maintain investigation records, including interview notes, written statements, supporting evidence, interview transcripts, findings summaries, and any related corrective action documentation. Investigation records will be retained in a secure and confidential manner and, where appropriate, maintained separately from employee personnel files.



Compliance & Audit

Human Resources leadership may periodically review investigation files to ensure investigations are being conducted consistently, documentation is thorough and professionally maintained, matters are handled in a timely manner, legal and policy compliance standards are met, and resolutions are appropriate and aligned with company practices and expectations

Revision History

Date	Description	Owner
May 2026	Initial creation and rollout	HR Department

Disclaimer:

This policy is intended to provide general guidance and does not create a contract, express or implied. The Company reserves the right to modify, suspend, or discontinue this policy at any time, with or without notice. Where state or local law differs from this policy, the Company will follow the requirements of the applicable jurisdiction.