



Critical Incident & Employee Mental Health Crisis Response Policy

Purpose

WhiteWater Express Car Wash ("WhiteWater") is committed to maintaining a safe workplace and responding promptly, professionally, consistently, and compassionately to critical workplace incidents and mental health crises. The purpose of this policy is to establish clear expectations related to emergency escalation, operational response coordination, employee support, evidence preservation, communication protocols, and return-to-work decision-making during serious workplace events.

Critical incidents often require immediate coordination between Operations, Human Resources, Safety, IT, Marketing, Legal, Executive Leadership, emergency responders, healthcare professionals, and law enforcement. This policy is intended to ensure incidents are managed consistently, employees are appropriately supported, operational disruption is minimized, and legal and regulatory obligations are met.

For incidents meeting established escalation criteria, the Company may activate its Emergency Response Team (ERT) to coordinate incident assessment, decision-making, communication, employee support, regulatory response, and operational recovery efforts.

Failure to appropriately escalate incidents, preserve evidence, follow communication protocols, or comply with response expectations may place team members, customers, and the organization at risk.

Scope

This policy applies to all WhiteWater Express Car Wash locations, corporate offices, field operations, facilities teams, contractors while onsite, and any team member or leader responsible for responding to workplace incidents.

This policy applies to any workplace event that may reasonably require emergency response coordination, law enforcement involvement, OSHA reporting consideration, operational stabilization, crisis communication, employee support intervention, or structured return-to-work assessment.

Definitions

Critical Incident: Any workplace event involving death, hospitalization, gunshot wounds, armed violence, workplace assault, serious bodily injury, threats of violence, active shooter or active threat situations, major vehicle incidents, suicide attempts occurring onsite, or any occurrence reasonably likely to result in significant team member trauma, OSHA involvement, law enforcement response, operational disruption, or media attention.

Mental Health Crisis: Any situation involving suicidal ideation, suicide attempts, credible threats of self-harm, severe emotional distress, or behavior indicating an immediate or potential risk of harm to oneself requiring intervention.

Workplace Violence: Any act or threat of physical violence, intimidation, harassment, disruptive behavior, or threatening conduct occurring in the workplace or during work-related activity that may impact employee safety or operations.

On-Site Incident: An incident occurring at a company location, company-controlled environment, or immediately adjacent workplace area, including parking lots or incidents directly tied to a scheduled shift.



Off-Site Incident: An incident occurring outside the workplace that later becomes known to the company.

Work-Adjacent Incident: An incident occurring near a company location or in connection to work activities where there may be operational impact, team impact, or reputational risk.

Team Member: Any WhiteWater employee regardless of role, level, or employment status.

Single Point of Contact (SPOC): The designated individual, typically the HRBP, responsible for coordinating communication, decision-making, and case management to prevent fragmented or conflicting outreach.

Medical Clearance / Fitness for Duty: Documentation from a qualified healthcare provider confirming a team member's ability to safely perform job duties, including any restrictions or accommodations.

Return-to-Work (RTW): The structured process for evaluating and approving a team member's return following a critical incident or mental health crisis.

Roles & Responsibilities

Role	Responsibilities
Team Members	Immediately report critical incidents, threats, injuries, unsafe conditions, or concerning behavior. Follow emergency instructions, prioritize personal safety, and cooperate with emergency responders and internal investigations.
Managers & Field Leadership	Immediately escalate incidents, coordinate emergency response efforts onsite, secure affected areas when safe to do so, preserve evidence, account for team members, stabilize operations, and coordinate with HR, Safety, and Executive Leadership.
HR Business Partner (HRBP)	Owns end-to-end case management for mental health crises and significant employee-impact incidents. Serves as SPOC. Coordinates communications, employee support, leave considerations, investigations, RTW decisions, legal compliance, and documentation.
HR Representative	Provides administrative and tactical support, including documentation, leave tracking, EAP coordination, and record management.
Regional Director (RD)	Responsible for site stabilization, operational execution, leadership alignment, and coordination with HRBP regarding team impact, operational continuity, and RTW planning.
Area Director (AD)	Manages immediate operational response at the site level, including emergency coordination, team support, and escalation to RD and HRBP.
Safety / Risk Management	Evaluates OSHA obligations, coordinates workers' compensation response, supports investigations, tracks corrective actions, and prepares for potential inspections or regulatory review.
Information Technology (IT)	Preserves surveillance footage, access logs, communications, and electronic evidence. Maintains access restrictions related to incident materials.
Marketing & Communications	Coordinates internal and external communications, manages media inquiries, prepares approved messaging, and ensures communication consistency.
Emergency Response Team (ERT)	When activated, coordinates cross-functional response activities, facilitates communication and decision-making, assigns response



Role	Responsibilities
	workstreams, and supports operational stabilization, employee support, regulatory compliance, and incident recovery efforts.
Executive Leadership	Supports coordinated incident response efforts, approves significant operational or communication decisions, and oversees organizational response and corrective actions.

Incident Response Procedures

All critical incidents and mental health crises must be treated as urgent and credible. Any leader who becomes aware of workplace violence, threats of violence, suicide threats or attempts, severe emotional distress, serious injury, active threats, hospitalization, or significant operational disruption is responsible for immediately notifying Human Resources and appropriate Operations leadership. In situations involving immediate danger, employees should contact 911 before notifying company leadership.

Depending on the nature, severity, and organizational impact of the incident, leadership may activate the Emergency Response Team (ERT) in accordance with the Critical Incident Response Program Toolkit. When activated, the ERT will serve as the primary coordination mechanism for cross-functional response activities.

Within the first several hours following notification of an incident, Human Resources and Operations leadership are responsible for confirming key facts before decisions are made. This includes establishing the sequence of events, identifying whether the incident occurred onsite, work-adjacent, or offsite, understanding the current status of the impacted team member, determining whether emergency responders or law enforcement were involved, and evaluating operational or safety concerns. All decisions must be based on verified information rather than assumptions, speculation, or incomplete reports.

Response actions will vary depending on the nature and severity of the incident. The company may coordinate emergency medical response, temporarily suspend operations, secure affected areas, preserve evidence, support impacted employees, coordinate with law enforcement, or implement temporary operational or security measures. For onsite incidents, leadership presence should remain visible and supportive throughout stabilization efforts.

When a mental health crisis is involved, the HRBP will generally serve as the designated Single Point of Contact to ensure communication remains coordinated and appropriate. Multiple leaders should not independently contact the impacted team member. Outreach should be supportive, respectful, and focused on the individual's wellbeing without pressuring the team member for details or return-to-work commitments. Available support resources, including the Employee Assistance Program, should be offered promptly. If the safety or location of a team member cannot be confirmed, Human Resources may coordinate a welfare check through local authorities when appropriate.

For high-impact incidents, leadership should communicate with affected teams as soon as reasonably possible while maintaining confidentiality and avoiding speculation. Communications should acknowledge that an incident occurred, reinforce available support resources, and provide operational guidance where necessary. Employees should not independently communicate with media representatives regarding active incidents unless specifically authorized to do so, see the [Media Statement Script](#) for more information.

Leaders and support teams are expected to fully cooperate with emergency responders, law enforcement, OSHA representatives, workers' compensation administrators, and authorized investigators. The company may preserve surveillance footage, witness statements,



communication records, access logs, operational records, and other evidence relevant to the investigation or response process.

Following incidents involving serious bodily injury, bloodborne pathogens, fatality, or other traumatic scenes, the company may utilize qualified third-party biohazard remediation or trauma scene cleanup vendors to ensure proper cleaning, sanitation, safety compliance, and restoration of the affected area. Team members should not be asked or expected to clean blood, bodily fluids, or other potentially hazardous materials associated with a critical incident unless specifically trained, properly equipped, and authorized to do so.

Access to affected areas may be restricted until law enforcement, emergency responders, Safety, and authorized remediation personnel determine the area is safe for re-entry and normal operations.

Return-to-Work

Return-to-work decisions following a mental health crisis or other significant critical incident are led by the HRBP in partnership with Operations leadership and, when necessary, Legal or Safety. A team member may not return to work until appropriate medical clearance or fitness-for-duty documentation has been received and reviewed.

Return-to-work assessments will consider the nature of the role, workplace safety considerations, operational impact, the wellbeing of the broader team, and any restrictions or accommodations identified by a healthcare provider. Depending on the circumstances, return-to-work arrangements may include a full return, modified duties, adjusted scheduling, temporary reassignment, or an extension of leave.

Under no circumstances should a team member return solely based on self-assessment when medical clearance is required.

Documentation & Records

All incidents covered under this policy must be documented accurately, objectively, and confidentially. The HRBP is responsible for maintaining the official case record, with support from HR Representatives as needed.

Documentation may include incident timelines, witness statements, OSHA records, workers' compensation documentation, surveillance preservation logs, communication records, return-to-work documentation, medical clearance documentation, investigation materials, operational reviews, and corrective action tracking. Documentation should clearly distinguish between confirmed facts, reported information, and information requiring further verification.

Medical documentation must be stored separately from general personnel records and access must be limited to individuals with a legitimate business need. All records will be maintained in accordance with company retention guidelines and applicable legal requirements.

Escalation & Compliance

Immediate escalation to HR leadership is required for incidents involving death, hospitalization, active violence, weapons, suicide attempts or credible self-harm threats, multiple impacted team members, OSHA-reportable events, law enforcement response, unclear safety status, significant operational disruption, or potential media exposure.

Adherence to this policy is required. Failure to follow established procedures, including failure to escalate incidents, failure to preserve evidence, unauthorized communication, failure to comply



with return-to-work requirements, or failure to maintain confidentiality, may result in corrective action up to and including termination of employment.

The company may periodically review incident response practices, documentation standards, emergency escalation procedures, operational safeguards, and training effectiveness to support continuous improvement efforts.

Final Guidance

How WhiteWater responds during critical incidents and mental health crises matters deeply to both the impacted individual and the broader team. Leaders are expected to respond with professionalism, consistency, discretion, urgency, and compassion while ensuring decisions align with company policy, legal obligations, and workplace safety expectations.

This policy is intended to reduce ambiguity during high-stress situations and provide leaders with a consistent framework for decision-making. When circumstances fall outside the guidance outlined in this policy, leaders are expected to escalate concerns and partner with Human Resources rather than act independently.

Insights gained from incident response reviews may be used to strengthen training, refine operational processes, and improve future response efforts.

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.