

### Investigation Matrix

TIER DESCRIPTION	ESCALATE TO	ALLEGATION TYPE - EXAMPLES	POSSIBLE CHARACTERISTICS
<b>All Investigations start with an Intake Process led by the person who took the initial call or inquiry to ensure timely resolution.</b>			
<b>Tier 1</b> Minor (or no) violation or general questions	No need to escalate – person who receives the complaint can complete the investigation. Option to partner with Legal if needed.	<ul style="list-style-type: none"> <li>• Handbook questions</li> <li>• Disagreement with policy</li> <li>• Interpersonal conflict (non-sexual comments, dirty looks, or non-sexual touch – not repeated)</li> <li>• Routine unsafe work conditions or safety violations</li> <li>• Missing company equipment (<i>ie: Job bag, laptop</i>)</li> <li>• Exposure to illness or pests</li> <li>• Company policy violations not addressed below</li> </ul>	<ul style="list-style-type: none"> <li>• Low risk</li> <li>• No financial impact</li> <li>• Does not need to be entered in NAVEX</li> <li>• Data gathering vs. interview</li> <li>• Reasonable basis that employee was not aware of policy</li> </ul>
<b>Following Intake, if an Allegation is determined to be Tier 2 or 3, an investigator will be assigned. They will schedule a meeting with whomever inputted the allegation.</b>			
<b>Tier 2</b> Violation with limited material risk to the company	Investigation Team (Legal partnership TBD based on allegations)	<ul style="list-style-type: none"> <li>• Unfair treatment not based on a protected class</li> <li>• Bullying</li> <li>• Abusive behavior</li> <li>• Threats against persons or property (non-imminent harm)</li> <li>• Improper use of company assets (<i>excluding normal policy violations</i>)</li> <li>• Unsafe working conditions (minor)</li> <li>• Privacy issues resulting from improper use of company property</li> <li>• Improper use of alcohol or other substances while working</li> </ul>	<ul style="list-style-type: none"> <li>• Tier 1 allegations involving repeat offenders/part of a pattern of violations</li> <li>• Deliberate choice to violate policy</li> </ul>
<b>Tier 3</b> Significant or serious violation with serious implications for the company	Investigation Team to partner with Legal Team (Legal Team to Directly Manage with Investigator)	<ul style="list-style-type: none"> <li>• Discrimination</li> <li>• Harassment (excluding inappropriate touch -- photographer to student)</li> <li>• Retaliation</li> <li>• Fraud</li> <li>• Falsification of company records</li> <li>• Unsafe working conditions that could result in serious injury or death</li> <li>• Serious or widespread violation of regulatory reqts. (OSHA, EPA, etc.)</li> <li>• Theft of company assets &gt; \$5,000</li> <li>• Inappropriate touch involving minors or customers</li> <li>• Allegations involving senior leaders (VP+)</li> <li>• Labor/union issues</li> <li>• Wage/hour issues (alleged violation of law re overtime, breaks, etc.)</li> <li>• Threats of violence (imminent harm)</li> <li>• Potential data breach or information system compromise</li> <li>• Allegations involving contractors</li> <li>• Investigations in response to demand letters, charges, lawsuits</li> <li>• Theft of company or Host assets</li> </ul>	<ul style="list-style-type: none"> <li>• May need to assess and request attorney client privilege</li> <li>• Raises an actual or potential conflict of interest</li> </ul>

- Potential data breach or information system compromise
- Allegations involving contractors
- Investigations in response to demand letters, charges, lawsuits
- Theft of company or Host assets