VIGIL & WHISTLEBLOWER POLICY

Policy Details	VIGIL & WHISTLEBLOWER POLICY
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#1. INTRODUCTION

Westlife Foodworld Ltd. and Hardcastle Restaurants Pvt. Ltd. individually and collectively referred to hereafter as "Company" and/or "the Company" believe that good communication between employees at all levels throughout the organization promotes better work practice. The Company seeks to conduct itself honestly and with integrity at all times. However, we acknowledge that all organizations face the risk of unknowingly harbouring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to rectify them. On this basis, employees are encouraged to raise genuine concerns about malpractice in the workplace without fear of reprisals. The Company will protect them from victimization and dismissal if they raise concerns in good faith.

#2. SCOPE

This policy applies to all Company employees. The Company has introduced these procedures to enable employees to raise or disclose concerns about malpractice (compliance and/or ethical violation) in the workplace at an early stage and in the right way, and they apply in all cases where there are genuine concerns, regardless of where this may be and whether the information involved is confidential or not. The term 'malpractice' includes but is not exhaustive of:

- Criminal offences;
- Breaches of legal duty (including negligence, breach of contract, breach of administrative law);
- Miscarriages of justice;
- Health and safety;
- Damage to the environment;
- The concealment or abetment of any of the above.

#3. COMMITTEE MEMBER DETAILS

Name	Designation	Email
Ms. Sulakshna Mukherjee *(Custodian)*	GM – Marketing & Corporate Communications	sulakshna.mukherjee@mcdonaldsindia.com
Dr. Shatadru Sengupta	Chief Legal Officer	shatadru@mcdonaldsindia.com
Ms. Sandhydeep Purri	Chief People Officer	sandhydeep.purri@mcdonaldsindia.com
Mr. Aditya Kharwa	Director - RSG, Business Operations	adityak@mcdonaldsindia.com
Mr. Sohel Nalwalla	Director – Supply Chain	sohel.nalwalla@mcdonaldsindia.com

#4. APPENDIX

(1) COMPLAINT FORM
(2) INVESTIGATION PROCESS
(3) PROCESS
  a. Specific behaviors expected from the employees
  b. Process for raising a concern
  c. Investigation process in respect of violation
  d. Documentation and reporting
  e. Vigil & Whistleblower protection
  f. False Disclosures.

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VIGIL & WHISTLEBLOWER POLICY - PROCESS

#1. DEFINITIONS

(1) Whistleblower:
A person or entity making a disclosure of any unethical activity that they have observed.
Whistle blower could be anyone from employees, contractors, contractor's employees, clients, vendors, interns, internal or external auditors, law enforcement/regulatory agencies or other third parties.

(2) Vigil and Whistleblower Committee:
The Vigil and Whistleblower Committee consist of a team of Senior Company Personnel who are required to assess independently the concerns raised by the Whistleblower. The office of the Vigil and Whistleblower Committee will be managed by the Vigil and Whistle blower Custodian.

(3) Investigation Committee:
This team consists of members nominated by the Vigil and Whistleblower Custodian to conduct the actual on ground investigation of the concerns raised by the Whistleblower.
The size of the Investigation Committee will be decided by the Vigil and Whistleblower Committee. A minimum of 2 members would be required to investigate the matter.

(4) The Standards of Business Conduct:
The Standards of Business Conduct is a guide to the ethical and legal responsibilities we share as members of the Company. This is not a complete rulebook that addresses every ethical issue that might arise. It is not a summary of all laws and policies that apply to HRPL business. It is not a contract, and it does not replace good judgment. Rather, the Standards of Business Conduct give us guidance and direct us to resources to help us make the right decisions.

(5) Ethical Behavior:
Behaviour in accordance with the accepted principles of right and wrong that govern the conduct of a profession including but not restricted to financial impropriety and accounting malpractices.

(6) Professional behavior:
Displaying a courteous, conscientious and generally businesslike manner at the workplace that strives to maintain a positive regard to others while avoiding excessive display of deep feeling.

(7) Compliance violation:
A compliance violation is an offense or interruption of legal and standard operating procedures usually due to negligence and failure to comply with established protocols, rules, or laws.

(8) Ethical violation:
An ethics violation is a wrong dealing with a moral duty, honest virtues, or professional standards. An ethical violation is an act that defies decent behavior or a governing principle. Violations are activities not conforming to or in accordance with established conduct of right and wrong and moral character.

Generally, unethical violations would fall under the below 4 categories.
Note: *References to the masculine gender shall be deemed to include other genders also.*

(1) HR ETHICS

Interactions between managers, business owners and employees create numerous opportunities for violation of ethics. Discrimination based on either ethnicity, gender, age or other factors is an issue. Managers who discriminate against minority groups in hiring practices, compensation and the employment terms can face legal and social penalty. Dishonesty and manipulation are also examples of unethical workplace behavior.

(2) ACCOUNTING ETHICS

Certain unethical accounting practices are illegal, such as misrepresenting income or expense figures on financial statements. There are a number of accounting practices that are considered unethical, as well, such as plumping the goodwill figure on a balance sheet or unjustifiably shifting expenses to inappropriate periods to influence current financial results.

(3) COMMUNITY IMPACT

Businesses often affect a variety of external stakeholders that have nothing to do with a company aside from the issues brought about by the company's actions. Large amounts of pollution in the air or water can introduce disease and cancer epidemics in local communities, for example. Simple nuisances like noise pollution or a significant increase in truck traffic can damage the quality of life in surrounding communities, as well. Completely ignoring these external impacts is clearly unethical.

(4) THEFT & FRAUD

Business owners or employees can commit violation of ethics on an individual basis, and/or on behalf of a company. Executives and employees can misappropriate money from the company for personal use before getting caught. Even front-line store operations can steal money or inventory directly from their employers.

#2. SPECIFIC BEHAVIOURS EXPECTED FROM EMPLOYEES

(1) HONEST & ETHICAL
All Company employees must observe the highest standards of personal and professional integrity, honesty and ethical conduct which is free from fraud and deception while working on the Company premises or while working for Company sponsored business.

(2) CONFLICT OF INTEREST
All Company employees are expected to avoid clash of his or her personal interest with that of the Company's which limit the ability to perform duties and responsibilities.

(3) CONCURRENT EMPLOYMENT
All Company employees shall not, without prior approval of the Vigil & Whistleblower Committee, accept employment or a position of responsibility whether for remuneration or otherwise, with any other company. This also includes providing "freelance" services to any other company.

(4) CONFIDENTIAL INFORMATION
Company employees shall not disclose any information concerning the Company's business, customers, suppliers etc. which is not in the public domain, unless authorized to do so when disclosure is required. This obligation continues even after leaving the employment of the Company.

(5) STATUTORY COMPLIANCE
Company employees must endeavor to ensure that all the applicable rules and regulations specific to Statutory Compliance are adhered to. Additionally, if any employee becomes aware of any information that he or she believes is evidence of any material violation of any law, rule, or regulation, then the employee must bring this to the attention of a senior management person.

(6) PREVENTION OF INSIDER TRADING (Please refer to Insider Trading Policy)

(7) CORPORTE OPPORTUNITY
Company employee should not exploit for their own personal gain, opportunities that discovered through the use of corporate property, information or possession, unless the opportunity is disclosed fully and in writing to the Westlife Leadership Council to pursue such opportunities.

(8) EXTERNAL COMMUNICATION WITH MEDIA & INVESTORS
Company employee should not exploit for their own personal gain, opportunities that discovered through the use of corporate Company employees must maintain and retain the reputation of the Company and ensure that information to media/investors is accurate and properly presented. Only designated representatives would be authorized to give interviews or make statements to the media/investors. Any other employees receiving requests for information from media/investors or any external agency should refer such requests to the Corporate Communications department of the Company.

(9) PROTECTION OF ASSETS
All Company employees must protect the Company's assets. Care should be taken to ensure that assets are not misused, misappropriated, loaned to others, sold, or donated without appropriate authorization. All Company assets must be used for legitimate business purposes.

(10) GIFTS & DONATIONS
Company employees must neither receive or offer or make directly or indirectly any illegal payments, remunerations, gifts, donations or comparable benefits which are intended to or perceived to obtain business or un-competitive favors for the conduct of its business.

#3. PROCESS FOR RAISING A CONCERN

(1) Any person may report allegations of suspected malpractice. Knowledge or suspicion of malpractice may originate from employees, contractors, clients, vendors, exchange students, internal or external auditors, law enforcement/regulatory agencies, interns, trainees, apprentices, retainers or other third parties. Allegations of malpractice may also be reported anonymously. Reports of allegations of suspected malpractice are encouraged to be made in writing so as to assure a clear understanding of the issues. Such reports should be accurate rather than provisional (speculative) and must contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of preliminary investigative procedures.
Malpractices can be reported through any one of the following:

The report can be presented to the Vigil and Whistleblower Committee through any of the methods mentioned below.

- **Email Complaint**: An email complaint can be sent to the Vigil and Whistleblower Committee at **policy@mcdonaldsindia.com** or **pal@mcdonaldsindia.com.**
- **Written Complaint:** Can be submitted to the Custodian or any member of the Committee.

If the complaint is against any member of the committee, the same can be marked to the Custodian of the committee who in turn will report the complaint to the Chairman of the Internal Audit Committee who will initiate the investigation under the responsibility of the designated committee comprising of non-related executives.

(2) A report may also be made to the direct reporting manager (in case there is no potential conflict of interest) or made to any other official in the Company whom the reporting employee can expect to have the responsibility to review the alleged unethical activity.

(3) In the event the Whistleblower does not wish to disclose the violation/malpractice through any of the methods mentioned above, he shall have direct access to the Chairperson of the Audit Committee in appropriate or exceptional cases. He shall contact said Chairperson in any one or more of the following contact details:

- Email
- Phone

If unable to get through, he shall contact the Company Secretary of the Company.
Note – *Anonymous reporting can be made by a Whistleblower only through written complaint and/or telephone.*

#4. INVESTIGATION PROCESS IN RESPECT OF VIOLATION

The following investigation process will be adhered to by the Company in case the report is filed with the Vigil and Whistleblower Committee or any other Company employee. For the detailed process on the Investigation, refer to **Appendix**.

#5. DOCUMENTATION & REPORTING

- The investigation report will be filed as per the format attached in Appendix 1 – Vigil and Whistleblower Investigation Report. All reports along with the supporting documentation and evidences will be filed and retained by the investigation team.
- A quarterly status report on the total number of complaints received during the period, with summary of the findings of the Vigil and Whistleblower Committee and the corrective actions taken will be sent by the Vigil and Whistleblower Custodian to the Chairman of the Audit Committee.
- All documentation pertaining to the complaint including but not restricted to the investigation report, corrective action taken and evidence will be maintained by the Vigil and Whistleblower Custodian for a period of 7 years.
- All complaints received will be kept confidential and will be shared only on a 'Need to Know' basis.
- All investigation reports shall be brought to the attention of:
  a) The Company Secretary
  b) The Chief Legal Officer or the Chief Financial Officer

#6. VIGIL & WHISTLEBLOWER PROTECTION

The Company will use best efforts to protect Whistle-blowers against reprisal, as described below.
1. The Company will keep the Whistle-blower's identity confidential, unless -

a) The person agrees to be identified.
b) Identification is necessary to allow the Company or legal officials to investigate.
c) The person charged with a violation in which the information is required as a matter of legal right.

2. The Company prohibits retaliation against a Whistle-blower with the intent of adversely affecting the terms or conditions of employment. Whistle-blowers who believe that they have been retaliated against may file a

written complaint with the Vigil and whistle-blower Committee. A proven complaint of retaliation shall result in a proper remedy for the person harmed and severe disciplinary action including termination of employment against the retaliating person.

3. In the event that a complaint made in good faith, is subsequently found to be untrue, no action would be initiated against the whistle blower. However, action will be taken against Whistle-blowers not making allegations in good faith.

If an individual raises an actual concern and is acting in confidence, even if it is later discovered that they are mistaken, under this policy they will not be at risk of losing their job or suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice.

#7. FALSE DISCLOSURES

COMPANY will treat all disclosures of malpractice seriously and protect the employees who raise concerns in good faith. However, appropriate disciplinary action will be taken in accordance against any employee who is found to have made a disclosure maliciously that they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate. This may result in dismissal.

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COMPLAINANT (S) INFORMATION – A person who has witnessed the violation

Name	Position	Department	Best Time To Call
Reporting Manager Name	Reporting Manager Position	Reporting Manager Department	Mobile No.
Home Address			Landline No.

Name	Position	Department	Best Time To Call
Reporting Manager Name	Reporting Manager Position	Reporting Manager Department	Mobile No.
Home Address			Landline No.

Name	Position	Department	Best Time To Call
Reporting Manager Name	Reporting Manager Position	Reporting Manager Department	Mobile No.
Home Address			Landline No.

SUBJECT (S) INFORMATION – A person who has suffered because of the violation

Name	Position	Department	Best Time To Call
Reporting Manager Name	Reporting Manager Position	Reporting Manager Department	Mobile No.
Home Address			Landline No.

Name	Position	Department	Best Time To Call
Reporting Manager Name	Reporting Manager Position	Reporting Manager Department	Mobile No.
Home Address			Landline No.

Name	Position	Department	Best Time To Call
Reporting Manager Name	Reporting Manager Position	Reporting Manager Department	Mobile No.
Home Address			Landline No.

WITNESS (ES) INFORMATION – A person who has viewed or been witness to the violation

Name	Position	Department	Mobile No.
Allegation (s)			Landline No.

Name	Position	Department	Mobile No.
Allegation (s)			Landline No.

Briefly describe the allegation the witness(es) will be able to confirm. Use additional paper if needed.

COMPLAINT

Briefly describe the improper activity(ies) and how you know about them. Specify who, what, when, where and how.
Use additional paper if needed.

EVIDENCE

Please list all documents or other items of evidence that prove the allegations to be true and explain how each item provides p
Use additional paper if needed. If you have any of the listed documents in your possession, please provide copies.

SIGNATURE

Hardcastle Restaurants Pvt. Ltd. undertakes and agrees with that the information provided in this form will be kept confidential and will not be disclosed to any third party, without prior notification to the employee any time during the employ

NAME	SIGN	DATE

VIGIL & WHISTLEBLOWER INVESTIGATION PROCESS

#1. INTRODUCTION

Most allegations of violations of work rules, policies, or law never reach an arbitrator, outside agency or court. Management should, however, investigate each allegation from the point of view that an outside party may review the matter. In all cases, maintain confidentiality to the extent possible, and communicate the existence or nature of the complaint on a 'need to know' basis.

#2. PRIOR TO BEGINNING THE INVESTIGATION

a) Determine if the employee must be removed from the current work assignment pending the completion of the investigation. This will primarily be due to safety concerns or to preserving evidence. Actions may include:
   - Suspending the employee with or without or part pay pending the completion of the investigation.
   - Reassigning the employee to another work assignment.
   - Temporarily assigning the employee to a different supervisor.

b) Determine who should conduct the investigation. Investigators should be trained in conducting employee misconduct investigations, be knowledgeable of policies and procedures, have good interview skills, and be impartial. There are several people that should NOT conduct an investigation, including:
   a. An investigator against whom the employee made a complaint.
   b. An investigator who is personally involved with the allegation, such as a witness or complainant.
   c. An investigator who is personally involved with the employee, such as a friend outside of work or a relative.
   d. An investigator who is emotionally involved, such as one who is too angry to be objective, or, one who is too emotionally involved in defending the employee or the individuals complained about it.

c) Develop an investigation outline:
   a. Identify the allegations/complaints.
   b. Identify who will be interviewed and the order of the interviews.
   c. Identify documents to review. Examples may include but are not limited to:
      - Payroll records/computer logins
      - Work rules and policies
      - Bargaining agreements and/or administrative rules
      - Acknowledgement forms of work rules, policies, etc.
      - Training and meeting records (attendance records and dates, subject matter or agenda, or notes/minutes)
      - Prior disciplinary actions, coaching and counselling, and written directives
      - Performance evaluations

   d. Outline the points to be covered in the interviews. Prepare topics that will be asked of interviewees so that answers can be compared.
      - Consider outlining topics to cover rather than questions. If questions are prepared and the witness responds differently than anticipated, it may throw the interviewer off track. With prepared questions, interviewers may become focused on the scripted questions and miss follow-up questions, or interviewers may fail to listen to the answers as they are preparing to ask the next question.
      - Questions should start as open-ended (broad) and transition to specific to gain detail.
      - Be alert to the fact you will need to ask follow-up questions based on information given during the interview.
      - Investigate the current allegations, not the employee's past behavior.

#3. CONDUCTING THE INVESTIGATORY INTERVIEWS

1) Utilize a private, secure location. You may consider an off-site location if the presence of the subject or witnesses will disrupt the workplace.

2) Do not interview witnesses in groups.

3) All investigatory interviews should be audio-recorded at a minimum. Include in the opening remarks the date, time, location, purpose, person being interviewed and person(s) conducting and present during the interview. If any breaks are taken, record the time you are shutting off the recorder. When the tape is turned back on, restate the name of the person being interviewed, the purpose of the break, the date and time, and state that no interview questions were asked during the break. At the conclusion of the interview, note the date and time and state that the interview is concluded.

4) Have two investigators participate in the interviews whenever possible, even if the interview is tape-recorded. One may ask the questions while the other takes more detailed notes and assists with follow-up questions.

5) Keep detailed notes of the interview even if you record the interview. Make sure you take the time to include the questions being asked and the responses. If a statement is important and you want to quote something, ask the interviewee to wait, record the response exactly as stated, then repeat it back to the interviewee and ask them to confirm the statement.

6) At the beginning of the investigation, explain that you are conducting the investigation. Advice the employee alleged to have engaged in misconduct that the investigation could result in discipline, up to and including discharge.

7) Pay attention to the employee's non-verbal behaviors and make note of these as appropriate. For example, if the employee cries, raises his/her voice, walks out of the room, documents this in the investigation notes. If the employee becomes angry or loses his/her composure, advise the employee that you will give him/her a few moments to gain composure before continuing the interview. If behavior is threatening or the employee may injure him/herself, property or others, contact the appropriate authorities.

8) Do not make any promises about the outcome of the investigation. If an employee question whether he/she will be disciplined or what will happen, indicate that you intend to do a full and complete investigation and you will determine an appropriate outcome.
9) Do not give your opinion about what occurred or what the interviewee is saying.

10) Tell the interviewee to contact you if anyone else contacts him/her about the investigation or if he/she recalls something not shared with you.

11) Do not guarantee that you are accepting the information from the interviewee confidentially or that you will maintain confidentiality of who complained or what was said. Inform the interviewee that information is shared on a need-to-know basis. Reassure the interviewee that you will investigate alleged retaliation.

12) Document only the facts. Use quotation marks only for exact quotations. Do not use them to emphasize words or your interpretation of what was said. Do not include opinion or stray remarks in your documentation. Do not include your recommendations in the notes of the interview.

13) Types of questions to consider:

- Who committed the act?
- What was the act? When did it occur and exactly what happened? What were you doing when it occurred?
- Where did it occur? Were you standing or sitting? How far were you from the act? What were the lighting conditions or the line of sight?
- How often did it occur?
- Why do you think the act occurred? (Motive)

- Find out if he/she saw or heard something (direct evidence) or if he/she concluded an act based on what they saw or heard (circumstantial). Example: you saw someone eat a cookie (direct) or you saw crumbs on their face (circumstantial) which led you to believe he/she ate the cookie.
- How did you react? What response did you make when it occurred or afterwards?
- Who did you discuss it with and when? What did you say?
- How did the act affect you? Has your job been affected in any way?
- Who else was present when the act occurred? Where were they in relation to you? Who else has any knowledge of the act? Has anyone else discussed it with you? If so, who and what did that person say? Did anyone see you immediately after the act?
- Did the person you are accused of inappropriate conduct engage in the same or similar conduct with anyone else? Who, what, where, when and how? Has anyone else complained to you about similar conduct?
- Did the employee alleged to have engaged in misconduct contact you about the act?
- Do you have any notes, evidence or documentation about the act?
- How would you like the situation resolved?
- Do you know of any other relevant information?

14) Ask open-ended questions and do not interrupt the person being interviewed unless the person needs to be redirected to answer the question asked. Do not ask leading questions. Ask clarifying questions if the answers are not clear.

15) You may require the witness or subject to respond to a question.

16) You do not need to provide a witness with the name of the complainant unless necessary. Consider whether the identity of the complainant is going to be kept confidential, or if the release of the name is important to adequately allow the subject the opportunity to respond to the allegation. It is often not possible to withhold the complainant's name when conducting a thorough investigation. Do not discuss statements made by others unless absolutely necessary, as it may affect the recall of the interviewee, or the interviewee may adopt the testimony of others as his/her own.

17) If the employee states that the allegation is false, ask him/her how the information could have been misconstrued; what actions/statements could have caused a misunderstanding; and, why the complainant or witnesses might have a reason to make false accusations.

18) Allow the employee to provide names of witnesses that could back up his/her side of the story. If the employee suggests other witnesses, you will need to interview them prior to closing the investigation.

19) Allow the employee to provide physical evidence or documentation regarding the incident.

20) Before concluding the interview, ask the employee if there is anyone else you should talk to and whether he/she has any other information they wish to provide.

21) After the interviews have been conducted and the evidence gathered, management needs to determine the credibility and probative value of the evidence.

    A. What was the demeanor of the interviewee? (Be cautious; these are only indicators.)
        - Appearance
        - Gestures
        - Voice
        - Other Behaviors
        - Was the witness straightforward or evasive?

    B. Was there evidence of bias on the part of any witness?
        - Was the witness the best friend or the worst enemy of the employee being investigated?
        - Was there motive or an interest in the outcome on the part of the witness?
        - Was the complainant/witness an inmate, patient, or client and is the statement credible?

C. Did the interviewee accurately describe or explain his/her observations?
   - Was the interviewee impaired?
   - If the interviewee's memory is not clear, evidence is speculative. For example, the witness may state, *"I can't recall exactly, but maybe he had his hand on her leg."*
   - It may help to have the witness link the incident to something that can be confirmed by outside evidence. For example, the witness may say she was sure the incident occurred at 3:15 p.m. because she was on break and always goes to break at 3:15 p.m. Check the pattern of breaks and interview other people aware of where the witness was at 3:15 p.m. to verify this pattern.

D. Are the witnesses consistent in their version of the facts?
   - If the statements, interviews and evidence are consistent, this strengthens your case.
   - Are perceptions distorted or exaggerated?
   - Are witness timelines accurate, diminished or exaggerated?
   - Have the witnesses attributed a motive or purpose for the incident that is not supported by the evidence?

E. If statements and/or interviews are inconsistent, this weakens the credibility of the case. If the witness statements are unclear or inconsistent, re-interview the witnesses to clarify facts. Compare written statements, if applicable, to answers given during an interview.

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F. Review the evidence:
   - Ensure that all witnesses have been interviewed.
   - What evidence has the subject provided in his/her own defense? Is it possible that there could be other evidence that the subject, complainant or witnesses have not provided?
   - Is there greater information supporting the allegation or disputing the allegation?
   - Look at the evidence as if you were opposing counsel

G. Are the policies inconsistent or unclear?
H. What are the possible defenses for the alleged violations?
I. Are there mitigating circumstances?
J. Was the investigation completed?
K. Was the investigation fair and impartial

#4. CONCLUDING THE INVESTIGATION

1) If the evidence supports the allegation of misconduct:
- Assess the severity of the rule violation.
- Have others been disciplined for this violation in the past? If so, what discipline was imposed?
- Work with the personnel officer to determine if there is just cause to take action and to determine the appropriate corrective action.
- Was the employee being investigated aware of the work rule or policy and did he/she understand that a violation of the rules or policies could result in discipline?
- Is the rule or policy reasonably related to the employer's operation?
- Inform the complainant that the investigation has been concluded and that appropriate action has been taken. Reassure him/her if there are other incidents or if he/she feels that retaliation is occurring, an investigation will be conducted.
- If discharge is considered, the employee must be informed that the investigation is complete and, based on the evidence, discharge is the appropriate remedy for the misconduct. Ask the employee if he/she has any additional information to offer for consideration before a final decision is made. If the employee offers additional information that could have an effect on the decision to discharge, the investigation should be reopened, and the new information should be followed up prior to a final decision being made.

2) If the evidence does not support the allegation of misconduct or is inconclusive:
   - Inform the subject that the investigation does not support the allegations.
   - Remind the subject he/she cannot retaliate against the complainant or witnesses.
   - Inform the complainant that the investigation did not support the allegations.

3) Management should:
   - Revise rules/policies that are not clear or implement new rules/policies, if necessary.
   - Determine if employees need training on policies and establish a periodic training schedule on major policies.
   - If an employee is suspended from work as disciplinary action, other employees should only be informed that the employee is absent from work.
   - If an employee is discharged for just cause, others may be told the discharged employee no longer works there, but the reason for the discharge should be withheld.

#5. ASSEMBLING THE INVESTIGATION REPORT

The investigation into the allegations of misconduct should be well documented by management prior to the imposition of discipline.

1. Index
2. Letter of Discipline
3. Employee Background:
   a. Full name
   b. Synopsis of employment
   c. Copies of prior disciplinary action that remains in the employee's personnel file.

4. Copies of Notice Rules:
   a. Employee acknowledgement forms of policies, directives, work rules
   b. Copies of appropriate policies, work rules, directives
   c. Notes from coaching and counselling
   d. Notes from team meetings/training sessions where a rule or process was discussed
   e. Other documents relating to the misconduct

5. Investigatory Interview Documentation:
   a. Interview notes from the complainant, the witnesses and the subject
   b. Complainant statement, if applicable
   c. Subject statements, if applicable
   d. Witness statements, if applicable
   e. Transcripts of the interviews and any other documentation or evidence that was gathered, reviewed, or relied upon in proving the offense or used to justify the discipline imposed.

6. Document supporting the determination of the appropriate level of discipline:
   a. Proof of comparable disciplinary actions imposed on other employees for similar violations.
   b. Be prepared to discuss how the appropriate level of discipline was determined.
      - Have all employees who violated this rule been disciplined? You will need to know who, when, and what form of discipline was imposed.
      - Is the discipline related to the seriousness of the offense? Was the length of service and past performance record of the employee taken into consideration?

7. Timeline of the incident and investigation – Investigations must be complete and timely. Your timeline should include:
   a. Date of complaint/initiation of investigation
   b. Date of subject and witness interviews
   c. Date of disciplinary action taken
   d. Dates that document delays in the investigation due to leave taken by subject or witnesses, letter of suspension with pay pending investigation if applicable, and any other relevant dates regarding the investigation process.

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