

EssilorLuxottica Employee Relations

Principles of Conduct – Operational Violations

What is an Operational Violation? Operational violations include issues involving theft, falsification or dishonesty.

How is it Addressed? When issues arise, management has the duty to ensure concerns are investigated and addressed. Remain calm, assess the situation and determine a plan to address the issues.

Additional Resources:

- **HR Solutions**
- **When to Involve Employee Relations**
- **Conducting Investigations**
- **Your Regional Manager**

Types of Operational Violations

- **Unauthorized Discounts** – unqualified discounts applied to customers or other employees including employee discounts.
- **Falsification of Time** – an employee provides or edits their timesheet to an inaccurate time of arrival or departure.
- **Transactional Dishonesty** - inaccurate information in a transaction, including sale-stealing and improper returns.
- **Theft** – unauthorized removal or taking of company product or property.

When Should a Concern be Escalated?

- **Review the When to Involve Employee Relations Escalation Chart** - the ER escalation chart will help you identify what issues can be handled with and without the support of Employee Relations. The ER escalation chart will help you determine if you should notify Employee Relations before taking any action. If escalation is needed, contact Employee Relations immediately and do not take any action until you have been directed to do so.
- **Partner with Your Regional Manager** – if uncertain about escalation, partner with your Regional Manager to review the details and decide on a course of action.
- **Is Termination a Possible Outcome?** - if termination is a possible outcome of the situation or if management deems termination is necessary, you must partner with Employee Relations for review and investigation. Submit the request for support using the Employee Relations eService portal (insert link).
- **Examples:**
 - **Non-Escalated** – an employee with no past issues provides a discount to a customer who was “looking for a deal.” Since this is a one-time issue and not reason for termination, the situation should be handled in the store in partnership with the Regional Manager if necessary.
 - **Escalated** – an employee edits their clock in time to be different than their actual working time. Given the severity of possible falsification of company records, the case should be escalated to Employee Relations.

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Conducting an Investigation

If an issue requires investigation without Employee Relations partnership, plan the investigation before proceeding.

Review the Conducting Investigations job aid for complete information and instructions for conducting investigations.

Partner with your Regional Manager for additional assistance or questions about the investigation process.

Information and Documentation to Consider When Conducting an Investigation

- **Timecards and Schedules** – crucial for attendance and timecard policy or procedure violations.
- **Transactions** – can provide evidence of discounts or other sale actions and may indicate how the process has been performed in the past.
- **Store Video** – may provide visual evidence of actions. Keep in mind that video may not indicate “intent” of the individuals involved.
- **Witnesses** – can provide another account of what happened. Keep in mind that witnesses may be hesitant to participate in the investigation or may not remember events completely.
- **Photos or Text Messages** – may provide visual or written evidence of actions.

Next Steps

Consider the following when determining the appropriate course of action to address unprofessional behavior.

- **Seriousness of Behavior** – Is the behavior severe or simply inappropriate?
- **Impact of Behavior** – Were customers or store operations negatively impacted?
- **Frequency** – Even if it not severe, is the behavior constant and ongoing?
- **Previous History** – Does the employee have a history of performance improvement coaching or is this a one-time event.
- **Regional Support** – Has the regional manager been advised of the situation and consulted regarding next steps?

Other Actions to Address Operational Violations

- **Verbal Coaching** – address a minor issue and set expectations in a private, direct conversation.
- **Information Corrective Action Record (ICAR)** – document coaching in writing and place on an Associate Performance Record.
- **Formal Corrective Action Form (FCAR)** – address a moderate to severe behavioral issue, including profanity, poor customer service or other issues, through use of an FCAR.