

# Threat management guidebook

Workplace violence  
Version 1.0

Confidential  
November 20, 2020

CNH Industrial America LLC  
700 State Street  
Racine, WI 53404





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## Table of contents

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▶ 1.	Introduction	3
▶ 2.	Threat management process	5
▶ 3.	Initial reporting and screening protocol	11
3.1	Initial assessment and escalation	12
▶ 4.	Assigning levels of concern	14
4.1	Level 1 WPV concern	14
4.2	Level 2 WPV concern	14
4.3	Level 3 WPV concern	15
4.4	Level 4 WPV concern	16
▶ 5.	Assessment protocol	17
5.1	Simultaneous considerations	17
5.2	Threat assessment	18
5.3	Management tools for TMT consideration	19
5.4	Guidance on process for termination of employment for Level 2 through Level 4 WPV Concerns	19
5.5	Consultation with external threat assessment experts	20
▶	Threat Management Incident Report Form	22
▶	Addendum: Staff Risk Assessment Matrix (SRAM)	24
▶	Annex: Site-level TMT template	27



## 1. Introduction

This document is intended to provide CNH Industrial America LLC (“CNH Industrial”) with standardized guidelines for responding to actual or potential workplace violence incidents and will serve as the foundational framework for CNH Industrial’s overall workplace violence prevention and response program. The establishment and functioning of a multi-disciplinary threat management team and process is a critical component of a best practice workplace violence prevention program. This guidebook is intended to:

- ▶ Document the standardized process by which CNH Industrial prioritizes, investigates, assesses and manages potential workplace violence incidents; and
- ▶ Provide a consistent methodology by which CNH Industrial’s corporate leadership will communicate and coordinate in addressing situations in which there is a concern for workplace violence.

The protocols and procedures identified in this guidebook are intended to supplement those in place to address reports related to issues such as health & safety, discrimination, harassment, ethics and compliance. This document is a guide only and is meant to provide options for how to respond; it is not intended to impose requirements on CNH Industrial but rather to suggest possible ways of responding. CNH Industrial’s corporate leadership may choose to deviate from the provisions of this document when deemed appropriate.

Reference is made to CNH Industrial’s Code of Conduct; Non-Violence in the Workplace Policy; Weapons Policy-North America; Drug and Alcohol Testing Policy; Health and Safety Policy; Workplace Violence Policy – North America; Racine Emergency Action Plan; Active Shooter Response Plan; and Weapons Response Plan. Behaviors that violate any of these policies may indicate a concern for workplace violence, and CNH Industrial should be prepared to respond accordingly. These policies provide employees with multiple channels to report concerns should they have reason to believe they are victims of, or witness to, an act they feel may constitute a violation of one of these policies. These reporting channels include:

- ▶ Manager or Supervisor
- ▶ Local Human Resources Representative
- ▶ Local Security Representative
- ▶ A member of CNH Industrial’s Internal Audit, Legal, or Global Compliance functions
- ▶ Anonymously through the CNH Industrial’s Global Compliance Helpline at [www.cnhindustrialhelpline.com](http://www.cnhindustrialhelpline.com)

This guidebook provides instructions on how to receive, communicate and manage incidents that are perceived as presenting a risk of workplace violence. It was created based on Control Risks’ review of CNH Industrial’s current practices and procedures (both formal and ad hoc), interviews with key stakeholders in CNH Industrial’s workplace violence prevention efforts, review of relevant policies and documentation, relevant health and safety standards, best practices as identified in the 2020 ASIS Workplace Violence Prevention and Response National Standard, and Control Risks’ experience in benchmarking standardized guidelines of other organizations.



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### Key definitions:

**Workplace violence:** Exercise or attempt to exercise physical force by a person against an Employee, in a workplace, that causes or could cause physical injury to that Employee. It is also a statement or behavior that can reasonably be interpreted as a threat to exercise physical force against an Employee that could cause physical injury in the workplace. Prohibited behavior also includes any other conduct that generates a reasonable concern for physical safety from violence that occurs on CNH Industrial's premises, at any off-site CNH Industrial-sponsored event or any other location where employees are engaging in work-related activities. Such prohibited conduct may include, but is not limited to, any of the following:

- ▶ Threatening or physically aggressive contact or harm towards any individual.
- ▶ Threatening an individual or his/her family, friends, associates, or property with harm.
- ▶ The intentional destruction or threat of destruction of company property.
- ▶ Threatening phone calls, email, mail to an employee's home or office, text messages, voicemail or other electronic means of communication.
- ▶ Unlawful or unauthorized surveillance; stalking.
- ▶ Any suggestion that violence by or against any employee, agent or individual on company property is appropriate.
- ▶ Conduct that a reasonable person could perceive as threatening.

**Domestic violence:** CNH Industrial recognizes the impact of domestic violence on the workplace. Domestic violence is defined by CNH Industrial as a pattern of abusive behavior occurring between two people in a current or former intimate relationship. It may include physical violence, sexual, emotional and psychological intimidation, verbal abuse, stalking and economic control. CNH Industrial is committed to heightening awareness of domestic violence and providing guidance for employees and management to address the occurrence of domestic violence and its effects on the workplace. CNH Industrial will make every effort to assist an employee experiencing threats of violence.

**Workplace harassment:** Per the referenced policy on these topics, CNH Industrial strives to provide a workplace free of harassment, discrimination and retaliation. At a minimum, "harassment" in this policy includes:

- ▶ Written or graphic material, including photographs, pictures, drawings, or other graphic images, conduct or communications, including e-mail, text messages, and social media posts that is offensive, disparages or shows hostility or aversion toward an individual or group because of protected category characteristics.
- ▶ Unwelcome verbal or physical conduct of a sexual nature, whether between the opposite or same sexes, in which submission or rejection of this conduct is used as the basis for any employment decision.
- ▶ Any unwelcome sexual advances, requests for sexual favors, or other unwelcome verbal or physical conduct of a sexual nature.
- ▶ Offensive or unwelcome physical conduct, including touching and gestures, regardless of the gender of the individuals involved.



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**Violence risk screening:** The investigative and analytical process followed by a Threat Management Team to make a gross and general determination of whether particular behavior should be viewed as generating a concern for possible violence and therefore should be treated under CNH Industrial's threat management protocols.

## 2. Threat management process

Due to the complex and multi-dimensional nature of a workplace violence program, effective prevention, intervention and response requires collaboration across corporate disciplines. CNH Industrial recognizes the importance of utilizing a multifaceted investigation and assessment protocol which involves, at a minimum, the Human Resources, Corporate Security, and Legal departments, based upon the given circumstances. Considering the number of business lines and facilities within the CNH Industrial organization, the CNH Industrial **Threat Management Team (TMT)** will adopt a flexible threat management process that is adaptable to the level of concern and location from which the situation of concern arises. The TMT may consider calling on the Global Product Line Leader, Plant or Site Manager, Facilities manager, Site security, local labor union representative(s), Site EH&S Manager, local HR manager, responsible manager or other similar supplementary resources as necessary to support the TMT in the gathering and evaluation of information.

Individuals with roles in the threat management process should be prepared to respond to incidents via reports made through any channel in a timely manner representative of the issue at hand. Reports should immediately be triaged (**see Section 3 – Initial Reporting and screening protocol**) to determine the assigned level of concern and will continue to be re-assessed as additional information is gathered throughout the threat management process. Assigning a level of concern enables the organization to appropriately prioritize the response to a particular situation, identify the site level and corporate disciplines involved in the response, determine who should be notified and the oversight/direction to be provided by the corporate level. The basic levels of concern are defined as follows:

### **Level 1 – No or Low Level of Concern** for Violence

A **Level 1** WPV concern is one in which there is a **low level of concern** for an act of violence. An individual who poses a Level 1 concern may act in a confrontational, challenging or intimidating manner. These concerns should raise a red flag to coworkers, supervisors and management that a problem is developing. This is the best time to proactively intervene. Failure to act at this level may result in escalation of the level of threat.

Representative behaviors include:

- ▶ Refuses to cooperate with immediate supervisor
- ▶ Spreads rumors and gossip to harm others
- ▶ Argues with coworkers
- ▶ Is belligerent toward partners and/or others
- ▶ Uses excessive profanity, particularly of a sexual nature
- ▶ Makes unwanted sexual comments



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- ▶ Inappropriate reasoning, impaired judgment

### **Level 2 - Some Concern** for Violence

A **Level 2** WPV concern is one in which the Incident Lead finds there is **some concern** for violence. The situation is causing only a minor effect on CNH Industrial, without injuries, and without operational or financial impact. The individual of concern may be sending the message, "It's me against them," and displaying behaviors which have caused some concern for the safety of others. These behaviors suggest the potential for violence if left unchecked; however, intervention is still likely to be effective. Representative behaviors include:

- ▶ Argues increasingly with partners, coworkers, vendors and/or management
- ▶ Refuses to obey company policies and procedures
- ▶ Becoming increasingly isolated
- ▶ Others express concern about potential for violence or self-harm
- ▶ Facing stressors on multiple fronts
- ▶ Sees self as victimized by management
- ▶ Expresses suicidal thoughts

### **Level 3 – Elevated (But Not Immediate) Concern** for Violence

A **Level 3** WPV concern is one in which the Incident Lead finds there is an **Elevated (but not immediate) concern** for violence. The situation may be causing a moderate effect on CNH Industrial operational or financial impact, but without injuries. The individual of concern may be displaying behaviors which have caused significant concern for the safety of others. These behaviors suggest the potential for violence if left unchecked; however, intervention is still possible and should be implemented as soon as practical. Representative behaviors may include those exhibited in a Level 2 concern, in addition to any of the following:

- ▶ Others express concern about potential for violence or self-harm
- ▶ Destruction or sabotage of company property/equipment
- ▶ Exhibiting increasing paranoia
- ▶ Verbalizes wishes/intent to hurt coworkers and/or management
- ▶ Has access to weapons
- ▶ Makes suicidal threats/gestures

**Level 4 – High-Level or Imminent Concern** for Violence The individual who displays behaviors posing a **high-level or imminent concern for violence** is very dangerous and maintains a clear intent to harm others. Intervention is generally not appropriate for coworkers, supervisors or management. This usually requires the assistance of law enforcement, security consultants and/or mental health professionals.



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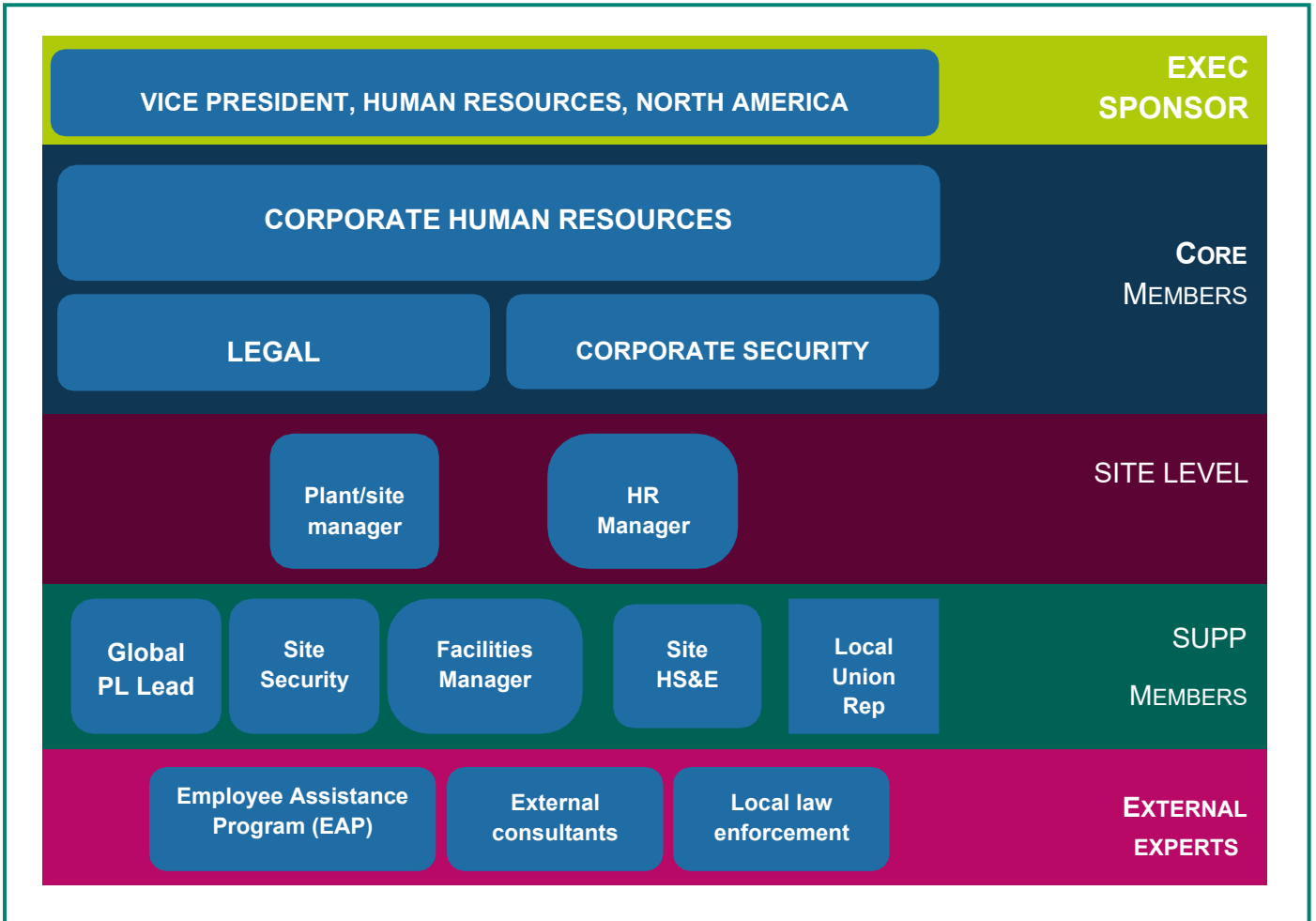
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- ▶ Physical fights
- ▶ Destruction of property
- ▶ Utilization of weapons to harm others
- ▶ Attempts suicide
- ▶ Attempts/commits murder, rape, arson

These Levels of Concern (1-4) will be determined following the utilization of the triage protocols outlined below (**see Section 3 – Initial Reporting and screening protocol**) and will continue to be re-assessed as additional information is gathered throughout the threat management process. Upon assigning the Level of Concern (**see Section 4- Assigning levels of concern**) the site or enterprise level TMT will consider recommended Objectives and Actions that correspond to each level. The key CNH Industrial stakeholders in this process are outlined as follows. Each CNH Industrial site (led by site leader and HR representative) will be tasked with completing and attaching an **Annex** to this Guidebook which captures the make-up of their site level TMT Chart (core and supplementary participants) drawing from the disciplines that will best reflect their organizational structure. This will largely be standardized across the enterprise and based upon their primary function as a manufacturing, distribution, warehouse, or corporate office. The following table is intended to provide an overall matrix of the disciplines involved in forming the site level disciplines in the an enterprise level **TMT**, which will include participation from the identified disciplines as appropriate and depending on the specific situation and location. **The below tables represent the core TMT and external experts they may consult (Table 1) and site-level team membership for each site.**



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Please note that the **Incident Lead** for a particular situation will be determined based upon the assessed Level of concern. The local HR Representative (Manager) will serve as the Incident Lead for Level 1 concerns and Corporate Human Resources for all Level 2-3 WPV concerns, given the critical role human resources plays in the investigation, assessment and management process. In addition, Global Product Line Leaders, Plant or Site Managers, and Site HS&E Representatives have critical visibility into the operating environment and physical security controls at all operating facilities. Further, EthicsPoint will be utilized as the WPV Case Management System and Global Compliance will play a key role in oversight of the case management system documentation and preparation of tracking of program metrics. The EthicsPoint Threat Management Incident Report Form can be assessed at [CNHPreventWPV.ethicspoint.com](http://CNHPreventWPV.ethicspoint.com) and a snapshot can be found on page 22 of this Guidebook for your reference.





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The primary specific roles and responsibilities of the various CNH Industrial disciplines regarding the threat assessment and management process are described in Table 1 below:

▶ **Table 1: Roles and responsibilities**

<b>Role</b>	<b>Role summary</b>	<b>Main responsibilities</b>
VP-Human Resources, North America	Executive Sponsor	<ul style="list-style-type: none"> <li>▶ Overall workplace violence program lead</li> <li>▶ Ensures effective implementation/operation of the overall workplace violence prevention program</li> <li>▶ Ensures Guidebook and WPV policies and procedures are up-to-date and available</li> </ul>
Corporate Human Resources	Will function as Incident Lead for all <b>Level 2-4 WPV</b> concerns and is responsible for the overall administration of the threat management process.	<ul style="list-style-type: none"> <li>▶ Convenes TMT members as required</li> <li>▶ Initiates/coordinates investigations or planned response actions</li> <li>▶ Recommends/assists in threat management plan development</li> <li>▶ Ensures follow-up assessment and action plan</li> <li>▶ Receives data on all threats/incidents of concern</li> <li>▶ Serves as liaison to experts/other team members/consultants</li> <li>▶ Provides information on employees as required</li> <li>▶ Coordinates counseling/disciplinary action</li> <li>▶ Advises of WPV issues for all CNH Industrial site locations</li> </ul>
Legal-Labor and Employment	Ensures that WPV program is aligned with all relevant laws and reflects the overall corporate objectives for the fair treatment of employees and third parties.	<ul style="list-style-type: none"> <li>▶ Provides advice on investigations, assessments and associated employee relations matters</li> <li>▶ Reviews documentation associated with disciplinary/termination actions</li> <li>▶ Assists with development of termination packages</li> <li>▶ Advises the TMT on implication of decisions made</li> <li>▶ Ensures that the TMT acts within the parameters of the law and follows precedent</li> <li>▶ Coordinates with North America General Counsel and/or external counsel if needed or required</li> </ul>



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HR Representative	HR Representative (Manager) with responsibility for the involved facility typically has the greatest degree of knowledge of the involved employee, operating environment and context of the situation and will act as Incident Leader for <b>Level 1 WPV</b> concerns.	<ul style="list-style-type: none"><li>▶ Resolves Level 1 WPV concerns as Incident Lead</li><li>▶ Maintains notes of the situation</li><li>▶ Works closely with employee of concern's supervisor</li><li>▶ Informs appropriate functions/disciplines of outcome</li><li>▶ Updates relevant stakeholders of progress in resolving</li><li>▶ Facilitates interaction with the Employee Assistance Program (EAP)</li></ul>
Compliance and Ethics Team	Responsible for ensuring that the WPV program is in line with the Code of Conduct and other CNH Industrial policies and procedures.	<ul style="list-style-type: none"><li>▶ Monitors and initially screens all Global Compliance Helpline reports</li><li>▶ Provides WPV and compliance training</li><li>▶ Shares data with Corporate HR and Internal Audit on all helpline reports of threats/incidents of concern</li><li>▶ Reviews data with Investigative Oversight Committee to ensure compliance with anti-harassment, anti-retaliation, and anti-retribution policies</li></ul>
Global Security	Global Security plays a key role in site security and operational support.	<ul style="list-style-type: none"><li>▶ Assists HR with investigations as needed</li><li>▶ Ensures workplace safety and security standards are met and maintained</li><li>▶ Supports in the delivery and routine scheduling of WPV related trainings</li><li>▶ Supports in the facilitation of employee wellness checks as required</li><li>▶ Reports any employee related behavioral concerns to the appropriate channels</li><li>▶ Maintains and updates corporate security and crisis management policies and procedures</li><li>▶ Assists with associated physical security concerns</li><li>▶ Arranges/provides security during investigations/termination proceedings</li></ul>
Employee Assistance Program	Employee Assistance Program (EAP) personnel serve as part of the supplementary team to provide valuable services designed to support the overall case management design.	<ul style="list-style-type: none"><li>▶ Serves as a source referral to appropriate providers, such as mental health professionals</li><li>▶ Manages secondary employee victimization issues</li></ul>
External expert resources	Experts from the legal, law enforcement, mental health and threat/risk assessment professions serve as valuable resources to be utilized on a case-by-case basis.	<ul style="list-style-type: none"><li>▶ External employment law counsel</li><li>▶ Psychologists/psychiatrists</li><li>▶ Fitness-for-duty examinations</li><li>▶ Threat/risk assessment professionals</li><li>▶ Provides both threat/risk assessment and case management advice</li><li>▶ Security experts</li><li>▶ Investigation firms</li></ul>

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### 3. Initial reporting and screening protocol

A critical component in managing a workplace violence issue is the effective communication and reporting of concerns. It is the responsibility of all employees and supervisors to report actual or suspected threats of violence and other concerns for workforce safety. Incidents or situations that may be reported could include concerning communications or behaviors from either an employee or from an external source (e.g., a threatening email or letter). It is also possible that concerning activity could be detected and reported by a supervisor, HR Representative, Security, EH&S, a site or plant manager, labor union representative, any employee or even an employee's family member.

- ▶ Individuals with roles in the threat management process should be prepared to respond to incidents via reports made through any channel in a timely manner representative of the issue at hand. Incidents should immediately be assessed to determine the relevant level of concern. See Section 4 for definitions related to level of WPV concern. If the recipient believes this to be a level 4 **emergency** situation, they should consider calling 9-1-1; Site or Plant Manager should be notified and appropriate emergency plans should be activated immediately.
- ▶ **Non-emergency situations: (level 1-3)**
  - ◆ The recipient should confirm that responsibility for the matter has been passed to designated Incident Lead **within one hour of receipt**, or as soon as otherwise practical, for initial assessment and designation of a level of concern (see section immediately below). The **Incident Lead should then conduct an immediate review** of all available or readily attainable information pertaining to the individual or incident and assess a level of concern.
    - **Incidents designated as level 3:** Incident Lead should immediately convene the core TMT, appropriate supplementary team members (Local HR Representative, Plant or Site Manager, etc.), and appropriate external experts for further evaluation and initiation of threat management strategies.
    - **Incidents designated as level 2:** Incident Lead should immediately notify the core TMT and appropriate supplementary team members. Incident Lead should initiate investigative process.
    - **Incidents designated as level 1:** Incident lead should be assigned to local HR Representative to manage the situation at the site level.
- ▶ Should the TMT convene, the Incident Lead (Corporate Human Resources) should immediately initiate the following investigation process:
  - ◆ The designated HR Representative should request the EthicsPoint WPV case management system for other entries pertaining to the employee or issue of concern. HR may initially review the employee's personnel file for relevant information.
  - ◆ The Incident Lead will contact employees who reported or witnessed the concerning conduct, as well as current or former managers of the employee of concern, to further understand the circumstances which led to the report.
  - ◆ The Incident Lead may also inquire as to any recent changes in the interactions these others have had with the person of concern, any external pressures on this person, concerns for safety expressed by them or others and any information relevant to the person's access to weapons. Should there be an opportunity for



more in-depth background inquiries with these witnesses or supervisors, a more extensive list of potential areas of inquiry for Violence Risks Screening are as follows:

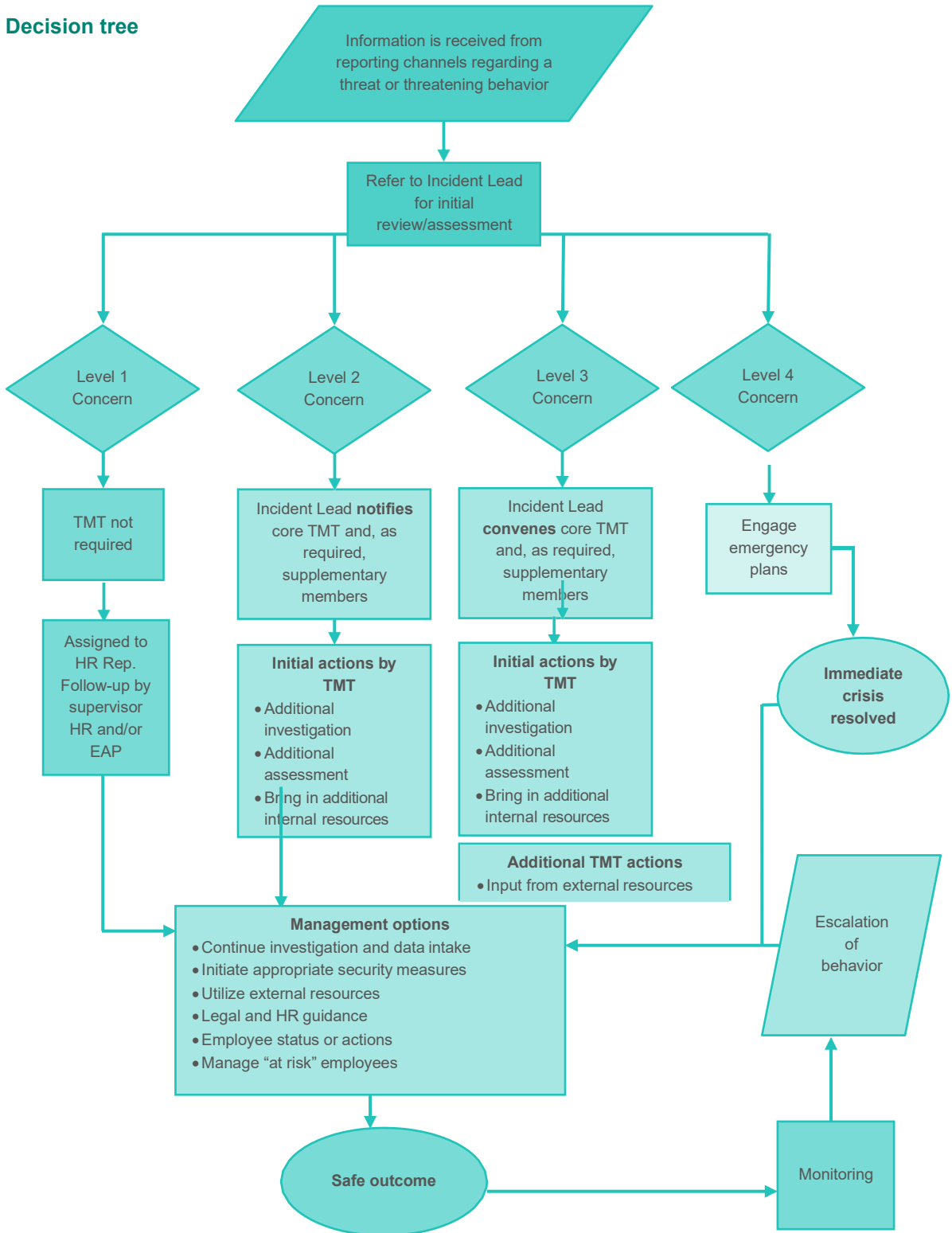
- Any change in productivity or attendance?
- Extreme sensitivity to any kind of criticism?
- Negative encounters with coworkers?
- Any current grievances pending?
- A history of grievances that are generally seen to be unreasonable?
- Any jokes or comments about weapons or violence?
- Use of alcohol inappropriately or use of illicit drugs?
- Known history of mental health issues?
- Prior encounters with the police?
- Suffered a recent major loss or stress at home or work?
- Inappropriately monitoring the behavior and performance of others?
- Unreasonable expectations and failure to understand the reasonable consequences?
- Suspicious of others?
- Constantly blames others and refuses to take responsibility?
- Felt too harshly disciplined, humiliated or publicly shamed at work?
- Feels justified in anger or unacceptable behavior toward another person?
- Are coworkers afraid of this person?
- Considered very rigid and inflexible, sullen, angry or depressed?
- Ever said he or she “has no options” or “There’s no hope or no way out for me?”
- Any immediate access to a weapon or dangerous material?
- History of making threats, using intimidation or escalating intimidating behavior?
- Identifies with offenders or praises workplace violence or other violent acts?
- Engaged in property damage or sabotaged equipment or projects?
- Seems suicidal in any way?
- Any known history of obsessively following other people or stalking?
- Ever hit people, thrown objects or physically threatened others?
- Any known record of violence?
- Announced a specific target or focus of grudge/issue?
- Announced any specific plans to do harm?
- Any support system in the area?
- Inadequate coping skills/ability to handle adversity well?
- Subject to a non-compete/non-solicitation/non-disclosure agreement?

### 3.1 Initial assessment and escalation

The following decision tree graphic is intended to be a summary illustration of the initial assessment and management process flow:



Figure 1: Decision tree





## 4. Assigning levels of concern

### 4.1 Level 1 WPV concern

A **Level 1** WPV concern is one in which there is a **low level of concern** for an act of violence. An individual who poses a Level 1 concern may act in a confrontational, challenging or intimidating manner. These concerns should raise a red flag to coworkers, supervisors and management that a problem is developing. This is the best time to proactively intervene. Failure to act at this level may result in escalation of the level of threat.

Representative behaviors include:

- ▶ Refuses to cooperate with immediate supervisor
- ▶ Spreads rumors and gossip to harm others
- ▶ Argues with coworkers
- ▶ Is belligerent toward partners and/or others
- ▶ Uses excessive profanity, particularly of a sexual nature
- ▶ Makes unwanted sexual comments
- ▶ Inappropriate reasoning, impaired judgment

#### ▶ Level 1 WPV objectives and actions

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<b>Objectives</b>	Incident Lead (local HR Representative) notifies the Site or Plant Manager and attempts to resolve issue in collaboration with concerned supervisor.
<b>Actions</b>	Incident Lead will document and disseminate via the WPV incident report form and work with the appropriate supervisor through standard HR protocols. Legal may provide guidance to the involved member of HR and/or supervisor as appropriate.

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### 4.2 Level 2 WPV concern

A **Level 2** WPV concern is one in which the Incident Lead finds there is **some concern** for violence. The situation is causing only a minor effect on CNH Industrial, without injuries, and without operational or financial impact. The individual of concern may be sending the message, "It's me against them," and displaying behaviors which have caused some concern for the safety of others. These behaviors suggest the potential for violence if left unchecked; however, intervention is still likely to be effective. Representative behaviors include:

- ▶ Argues increasingly with partners, coworkers, vendors and/or management
- ▶ Refuses to obey company policies and procedures
- ▶ Becoming increasingly isolated
- ▶ Others express concern about potential for violence or self-harm



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- ▶ Facing stressors on multiple fronts
- ▶ Sees self as victimized by management
- ▶ Expresses suicidal thoughts

#### ▶ **Level 2 WPV objectives and actions**

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<b>Objectives</b>	Incident Lead (Corporate Human Resources) notifies the Site or Plant Manager and initiates immediate actioning of the TMT process to prevent escalation of the issues/risk.
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<b>Actions</b>	<p>A referral will be made to the TMT to process for further investigation, assessment and identification of management strategies. The TMT will be comprised of core representatives, as well as supplementary members and/or external experts when appropriate.</p> <p>The Incident Lead will manage the investigative process.</p> <p>The Incident Lead will document and disseminate using the WPV incident report form and TMT tracking form provided in the Appendix of the guidebook.</p> <p>The Incident Lead will ensure the investigative file is placed in the EthicsPoint WPV CMS.</p> <p>Once the investigation is completed, the Incident Lead will close the investigation and place a note in the employee's personnel file, when appropriate.</p>
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### 4.3 Level 3 WPV concern

A **Level 3** WPV concern is one in which the Incident Lead finds there is an **Elevated (but not immediate) concern** for violence. The situation may be causing a moderate effect on CNH Industrial operational or financial impact, but without injuries. The individual of concern may be displaying behaviors which have caused significant concern for the safety of others. These behaviors suggest the potential for violence if left unchecked; however, intervention is still possible and should be implemented as soon as practical. Representative behaviors may include those exhibited in a Level 2 concern, in addition to any of the following:

- ▶ Others express concern about potential for violence or self-harm
- ▶ Destruction or sabotage of company property/equipment
- ▶ Exhibiting increasing paranoia
- ▶ Verbalizes wishes/intent to hurt coworkers and/or management
- ▶ Has access to weapons
- ▶ Makes suicidal threats/gestures



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### Level 3 WPV objectives and actions

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<b>Objectives</b>	Incident Lead (Corporate Human Resources) notifies the Site or Plant Manager and initiates immediate actioning of the TMT process to prevent escalation to violence. Support from external threat assessment experts and/or notification of law enforcement may be appropriate
<b>Actions</b>	The TMT will be notified and convened immediately to process for further investigation, assessment and identification of management strategies. The TMT will be comprised of core representatives, as well as supplementary members and/or external experts when appropriate. Level 3 concerns likely necessitate more immediate intervention efforts. Consultation with an external threat assessment expert should be considered. Depending on the severity of the situation, law enforcement notification may be appropriate. The Incident Lead will manage the investigative process. The Incident Lead will document and disseminate using the WPV Incident report form and TMT tracking form provided in the Appendix of the guidebook. When appropriate, the employee may be placed on administrative leave pending evaluation. The Incident Lead will ensure the investigative file is placed in the EthicsPoint WPV CMS. Once the investigation is completed, the Incident Leader will close the investigation and place a note in the employee's personnel file, when appropriate.

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## 4.4 Level 4 WPV concern

The individual who displays behaviors posing a **high-level or imminent concern for violence** is very dangerous and maintains a clear intent to harm others. Intervention is generally not appropriate for coworkers, supervisors or management. This usually requires the assistance of law enforcement, security consultants and/or mental health professionals.

- ▶ Physical fights
- ▶ Destruction of property
- ▶ Utilization of weapons to harm others
- ▶ Attempts suicide
- ▶ Attempts/commits murder, rape, arson





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#### ▶ Level 4 WPV objectives and actions

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- Objectives**
- ▶ Immediate response and safety of employees
  - ▶ Accountability
  - ▶ Situation containment and crisis management
  - ▶ Unity of command
- 

**Actions** Refer to protocols outlined in CNH Industrial's Active Shooter Response Plan and Weapons Response Plan. Call 9-1-1 in an emergency situation that requires an immediate response from external emergency response services. Notify Site or Plant Manager and engage Emergency Action Plans as appropriate. The Incident Lead will ensure the investigative file is placed in the EthicsPoint WPV CMS. Employment status decision to be made by appropriate TMT disciplines, up to and including termination.

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## 5. Assessment protocol

All reported threats or incidents of concern assessed as Level 2 through Level 4 must be further investigated and assessed by the TMT process, with appropriate documentation of the investigation and response actions implemented.

Depending on the severity of concern, the employee may be placed on administrative leave pending an internal investigation and/or a psychological or other medical evaluation. This will be a decision made by the Incident Lead through consultation with the TMT and based upon the totality of the circumstances.

The Incident Lead may continue or expand upon the previously initiated investigation. Additional investigative steps to be taken at this time will draw upon the TMT's multi-disciplinary resources and may include the following:

1. Information Technology to review online activity and initiate email\calls\SMS monitoring
2. Facilities to review access records (to notice changes in behavior and identify risk periods)
3. Legal to contact outside consultancy to request a full scope risk review of the individual, and may initiate surveillance, background checks or any other necessary action
4. Incident Lead or other representative from either Security or EH&S to deactivate badge and notify guards/reception (Incident Lead/Security/Legal must also be notified if they did not direct deactivation)
5. Legal will simultaneously conduct a review of any available documentation of past criminal and civil transgressions, court issues, weapons license, employment file and investigation files
6. Site or Plant Manager will notify law enforcement, if appropriate

### 5.1 Simultaneous considerations

If the employee of concern has access to building infrastructure systems or is in a position to be able to sabotage critical assets, TMT may consider developing a security plan to ensure the employee does not have unescorted

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access to key systems or that his/her access is restricted via changes to badge access and that the access report and badge is programmed to warn of access attempts into any restricted area.

During the investigation process, the Incident Lead should maintain regular contact with the supervisor and individual making the report to keep them updated on the situation. No generic messages to staff are to be sent out. The supervisor, with guidance from the involved HR representative and/or a member of the Legal Department, may address staff on how to discuss issues within and outside of the group.

## 5.2 Threat assessment

Following additional investigation, the TMT will conduct its more comprehensive threat assessment and decide the next steps. In conducting the threat assessment, the following risk factors and warning signs should be taken into consideration:

- ▶ History of aggressive behavior
- ▶ Threats, bullying
- ▶ Decreased and inconsistent productivity
- ▶ Impulsivity and low tolerance for frustration
- ▶ Recent poor performance, disciplinary action
- ▶ Changes in behavior
- ▶ Signs of emotional distress, depression
- ▶ Deterioration in self-care
- ▶ Homicidal or suicidal ideation
- ▶ Chronic grievances and disgruntlement
- ▶ Abnormal obsessions
- ▶ Propensity to use violence/threats for control
- ▶ Social isolation and poor peer relationships
- ▶ Verbal abuse
- ▶ Unstable work history
- ▶ Angry outbursts
- ▶ Fascination with weapons or with violent acts
- ▶ Coworkers are afraid of the employee
- ▶ Substance abuse
- ▶ Unwanted romantic pursuit
- ▶ Paranoia
- ▶ Hypersensitivity to criticism
- ▶ Increasing belligerence
- ▶ Lack of support network/coping skills



The TMT should utilize a holistic approach to assessing the threat and developing appropriate management strategies and consider all aspects of the life of the individual of concern, including work, family and social, physical and mental health. Careful attention should be given to the presence and severity of any of the above-referenced warning signs and risk factors, as well as the adequacy of corresponding support and coping mechanisms. Significant changes from established baseline behaviors and attitudes are most noteworthy, especially if they point to a person in crisis or behaviors that appear to be escalating toward violence. The appropriate course of action to manage the potential threat will depend on the unique circumstances of each situation.

### 5.3 Management tools for TMT consideration

The TMT must maintain flexibility in using the below tools to ensure that each case is managed as appropriate for its unique circumstances, with the goal being to reduce the risks to CNH Industrial personnel and assets. The TMT should strive to mitigate the stress or trauma which the management efforts could cause the individual of concern. For individuals who are in a fragile emotional state and already perceive themselves as being the victim of unfair treatment and persecution, there is a heightened risk that disciplinary actions could trigger retaliatory violence. This heightened risk may coincide with the period during which CNH Industrial's ability to observe or monitor the individual of concern is diminished. For example, there may be very infrequent contact after termination occurs, limiting the opportunities to detect statements or behaviors that may suggest the terminated employee is contemplating an act of retaliation. Therefore, threat management strategies should be implemented in a manner which takes into consideration the unique circumstances of each situation. The Incident Lead will be the ultimate decision maker on the appropriate management tools, in consultation with TMT members for Level 2 – Level 4 concerns. Threat management tools for consideration include, but are not limited to the following:

- ▶ Verbal or written warnings
- ▶ Restrictions of access
- ▶ Administrative leave
- ▶ Psychological evaluation (coordinated through EAP) or other medical examination
- ▶ Termination
- ▶ Return to Work exam
- ▶ EAP referral for counseling
- ▶ TMT consultation with EAP on managing the situation
- ▶ Drug and alcohol testing
- ▶ Consultation with family members
- ▶ Consultation with local police contacts
- ▶ Consultations with security contractor, guard manager
- ▶ Violence risk assessment by external specialized consultant

### 5.4 Guidance on process for termination of employment for Level 2 through Level 4 WPV Concerns

When the decision is made to terminate an employee following a Level 2 through Level 4 WPV concern, special precautions should be taken and the following protocol is recommended:



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- ▶ If possible, terminations should be conducted at the end of the employee's shift in the early to middle part of the week.
- ▶ Consideration should be given to benefits package and availability of an outplacement counselor.
- ▶ A suitable meeting room should be identified close to the facility exit which does not offer immediate access to CNH Industrial personnel.
- ▶ Ensure HR personnel are not left alone in the room with employee being terminated. If supervisor or site manager exits once his portion is finished, the supervisor should immediately be replaced by a representative from Legal, HR, or Security.
- ▶ If necessary, external security personnel utilized should be positioned outside the meeting room to monitor meeting in a low-profile manner.
- ▶ Employee being terminated should be seated on the opposite side of a long table, with personnel conducting the termination seated closest to the exit door and with clear line of sight of the exit door.
- ▶ Terminated employee's belongings should be boxed up during the termination meeting and offered as they are walked to the exit.
- ▶ Terminated employee should not be allowed access back to the work area.
- ▶ Any external security personnel utilized should re-position to ensure terminated employee takes exits the property.
- ▶ For Level 4 (and possibly Level 3) concerns, law enforcement and, if not possible, specialized onsite security should be notified and requested on-site.
- ▶ If time and circumstances allow, Staff Risk Assessment Matrix (Addendum) should be completed and reviewed by TMT prior to termination meeting,
- ▶

## 5.5 Consultation with external threat assessment experts

If the situation is assessed to be particularly aggravated and concerning, the TMT may contact an external threat assessment expert to provide a more comprehensive assessment. In addition to the details of the particular situation, typical supporting data the external expert initially may seek from each of these disciplines would be as follows:

### Human Resources

- ▶ Current work status of concerning employee
- ▶ Prior negative work history
- ▶ Personal data of the employee, such as marital status, children, home ownership
- ▶ Any trusted coworkers who may have contact with the employee of concern
- ▶ Any ADA issues/accommodations at play

### Security

- ▶ Any current enhancements to physical security (related to the case) or law enforcement contact



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- ▶ Any knowledge of weapons possession
- ▶ Prior or contemporaneous checks of criminal history

**Legal**

- ▶ Knowledge of restraining orders/or intent to acquire same for company



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# Threat Management Incident Report Form

New Report

Policies

Print

## Statement of Purpose

Please complete this form if you are the designated Incident Lead for any report of a potential violation of CNHI's workplace violence policy that is assessed as a Level 2, 3, or 4 concern, based upon the assessment criteria described in CNHI's Threat Management Guidebook.

Incidents or situations that may be reported could include any concerning behaviors, communications, or conduct from either an employee or external person that generates a reasonable concern for physical safety from violence for any member of the CNHI workforce.

**THIS FORM IS NOT AN EMERGENCY SERVICE: Do not use this form as the first report of events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.**

Items marked with a diamond ♦ are required fields.

### Your Information *(You, the person completing the form)*

#### Name & Contact Information

Save "Your Name & Contact Information" for future use.  
*(By checking this box you agree to allow NAVEX Global to store your information in a "Cookie" on this computer.)*

Prefix  ♦ First Name  M.I.  ♦ Last Name

Select One

♦ Job Title  ♦ Employee ID

♦ Phone Number (Preferred)  Phone Number (Alternative)  ♦ Email

Include the area code, extension, and/or dialing codes if applicable. Include the area code, extension, and/or dialing codes if applicable. Format: username@domain.com

### Reported By *(The person who brought this incident to the company's attention)*

**Reporter** ♦ Are you entering the report on behalf of another individual?  
 Yes  No  
Select One

### Location *(Where the incident took place)*

**Location** Click the button labeled "Look-Up" to locate and select a location.

♦ Region

Select the Region where the employee affected by the actual or potential conflict of interest is located. If you do not know where the issue occurred, select the region you are located.

♦ Name  ♦ Country

### IMPLICATED PERSON(S) *(List the name of the person who is the subject of this workplace violence concern.)*



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**Implicated Person(s)**

◆ Relationship

Prefix  ◆ First Name  M.I.  ◆ Last Name

Phone Number (Preferred)  Phone Number (Alternative)  Email

Include the area code, extension, and/or dialing codes if applicable.

(Format: username@domain.com)

**Incident Details**

**Issue One**

◆ Select the type of issue that best represents the incident.

Description

*No type of issue or event selected.*

**Details**

◆ Provide all details regarding the alleged violation, including the locations of witnesses and any other information that could be valuable in the evaluation and ultimate resolution of this situation.

**Previously Reported**

◆ Has this issue/incident been previously reported?

Yes  No  Unknown

Select One

**Others Involved** (List any accomplices, witnesses, or other individuals with information about this incident.)

**Others Involved**

◆ Were any other individuals involved in this incident?

Yes  No

Select One

Cancel

Print

Submit



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## Addendum: Staff Risk Assessment Matrix (SRAM)

This document is to be completed **before** all Level 2 – Level 4 employee terminations (if time and circumstances allow), and as ad-hoc basis as part of risk assessment process. For termination, the document should be gathered from both the HR file and interviews of current and former supervisors. The TMT team should meet to review the file and assess risk to CNH Industrial with potential escalation before any action is taken.

### Staff Risk Assessment

Name of Supervisor Filling Out Form

Employee Name

Employee ID

Position

Years with Company

Primary Location of Work Area (Building)

#### Question

#### Response

Yes

No

Unknown

1. Do you feel this person may be cause for concern because of the action being taken based on your knowledge and previous experiences with this person or his/her previous behavior?

2. Has there been a change in productivity or attendance from this person?

3. Has this person engaged in property damage or sabotaged equipment or projects?

4. Is this person very adverse to any kind of criticism?

5. Has this person had encounters with co-workers?

6. Does this person have any current grievances pending?

7. Does this person have a history of grievances that are generally seen to be unreasonable?





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8. Does there seem to be a change in his or her belief system?				
9. Does this person make jokes or comments about weapons or violence?				
10. Is this person known to use alcohol inappropriately or use illicit drugs?				
11. Does this person have a known history of mental health issues?				
12. Has this person had prior encounters with the police?				
13. Has this person suffered a recent major loss or stress at home or work?				
14. Does this person inappropriately monitor the behavior and performance of others?				
15. Does this person appear to have unreasonable expectations and fail to understand the reasonable consequences of actions by self and others?				
16. Is this person suspicious of others?				
17. Does this person constantly blame others and refuse to take responsibility?				
18. Has this person been inappropriately joining crusades/ causes at work, especially waging one-person "wars"?				
19. Does this person believe that he or she has been humiliated by someone at work?				
20. Does this person believe that he or she was too harshly disciplined or publicly shamed?				
21. Does this person feel justified in his or her anger or unacceptable behavior toward another person?				
22. Are co-workers afraid of this person?				
23. Is this person seen to be very rigid and inflexible, sullen, angry or depressed?				



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24. Does the person say he or she “has no options” or “There’s no hope or no way out for me?”				
25. To your knowledge, does this person have immediate access to a weapon or dangerous material?				
26. Does this person have a history of making threats, using intimidation or escalating intimidating behavior?				
27. Does this person seem to identify with offenders or praise workplace violence or other violent acts?				
28. Does this person seem suicidal in any way?				
29. Does this person have any known history of obsessively following other people or stalking?				
30. Has this person hit people, thrown objects or physically threatened others?				
31. Does this person have a known record of violence?				
32. Has this person named a specific target in his or her threat or is there a known person he or she has a grudge/issue with?				
33. Has this person announced any specific plans to do harm to themselves or others?				
34. Does this person have a support system in the area?				
35. Does this person have good coping skills/ ability to handle adversity well?				



## Annex. Site-level TMT

