

**To:** [Management Team / Department Heads]

**From:** [HR Department / Legal Counsel]

**Date:** [Insert Date]

**Subject:** Compliance Guidelines and Strategy for Upcoming Employee Meetings

Dear [Name],

In response to the current labor organizing activity, we will be conducting mandatory meetings (captive audience meetings) to discuss the company's position. To ensure full compliance with the National Labor Relations Act (NLRA) and recent NLRB General Counsel memos, all managers must adhere to the following strategy and legal constraints.

### 1. Meeting Objectives

- Provide factual information regarding the impact of unionization.
- Explain the company's preference for a direct relationship with employees.
- Correct any misinformation circulated by third parties.

### 2. Compliance Guidelines (T.I.P.S. Rule)

To avoid Unfair Labor Practice (ULP) charges, you must **NOT** engage in the following:

- **Threaten:** Do not threaten employees with loss of jobs, benefits, or office closures if they support a union.
- **Interrogate:** Do not ask employees about their union sympathies, attendance at meetings, or how they intend to vote.
- **Promise:** Do not promise pay raises, promotions, or improved benefits in exchange for voting against the union.
- **Spy:** Do not engage in surveillance or give the impression that you are monitoring private union activities.

### 3. Protected Speech (F.O.E. Rule)

You **ARE** legally permitted to share:

- **Facts:** Share data on union dues, strike history, and the reality of collective bargaining.
- **Opinions:** Express personal or company views on why a union is not necessary.
- **Experiences:** Share past experiences with unions in other workplaces.

### 4. Attendance and Conduct Strategy

- Meetings should be held during paid working hours.
- Maintain a professional, non-confrontational tone at all times.

- Do not prevent employees from leaving if they express that the meeting is coercive, as per evolving state-level "Captive Audience" bans.
- Document the date, time, and attendees of each session.

Please review the attached script for specific talking points. If an employee asks a question you cannot answer, state that you will follow up with them later after consulting with Human Resources.

Sincerely,

[Signature]

[Name and Title]