Global Business Continuity Management Policy

May 1, 2017

Table of contents (“TOC Header”)

[Purpose 3](#_Toc488661104)

[Scope 4](#_Toc488661105)

[Applicable Audience 4](#_Toc488661106)

[Compliance & Enforcement 4](#_Toc488661107)

[Policy Statements 4](#_Toc488661108)

[1. Roles and Responsibilities 4](#_Toc488661109)

[2. Planning and Oversight 5](#_Toc488661110)

[3. Exercising 6](#_Toc488661111)

[4. Training & Awareness 7](#_Toc488661112)

[5. Maintenance and Management Reporting 7](#_Toc488661113)

[Applicable Standards 7](#_Toc488661114)

[References and Mandates 7](#_Toc488661115)

[Legal Conflicts 8](#_Toc488661116)

[Exceptions 8](#_Toc488661117)

[Document Control Information 9](#_Toc488661118)

[Revision History 10](#_Toc488661119)

## Purpose

The Alight Solutions Global Business Continuity Management Policy (“Policy”) establishes Alight’s requirements for maintaining a global program that adequately prepares Alight to anticipate and respond to significant business disruptions with protocols that protects the welfare of all Alight colleagues, business operations, reputation, image, and in the interests of its shareholders and clients.

This global policy governs Hewitt Associates LLC, including all business units and subsidiaries. It supports efficient business operations, preservation of corporate memory and compliance with relevant legal and regulatory requirements by mandating development of business continuity plans.

Alight is committed to being prepared to anticipate and respond to undesirable and disruptive incidents that could potentially impact the welfare of individuals and the continuity of business operations. Alight has developed a framework for developing global business continuity plans supported by established governance and a Global Business Continuity Management Policy.

The sustainability of client satisfaction and shareholder value relies on the continuous operation of Alight’s critical and vital processes. Ensuring these core values requires Alight to take the necessary actions to anticipate, plan for and react to an interruption to critical and vital business processes.

Business continuity plan act as catalysts to sustain critical operations by:

* Identifying critical business processes and the impact of their interruption;
* Formulating and implementing strategies to minimize the impact (i.e. productivity, revenue, financial performance, image) and recover critical and vital processes; and
* Administering an exercising and maintenance program to ensure viability of the plans.

## Scope

The scope of this Policy is global, which includes all business units, all regions, and all entities of the Hewitt Associates LLC (“Alight”). Alight refers to all wholly-owned subsidiaries of Hewitt Associates LLC, all subsidiaries in which Hewitt Associates LLC has a controlling interest, and all agents or authorized representatives of Hewitt Associates LLC or its subsidiaries.

## Applicable Audience

This Policy applies to all colleagues, contractors, and vendors of Alight. The term "colleague" refers to all full-time employees, part-time employees, temporary employees, and interns who provide services to Alight. The term “contractor” refers to any individual on another company’s payroll (contactors, outsourcers, consultants, contingent workers, temporary agency workers, etc.) who provides services to Alight. The term “vendor” refers to all other third parties with which Alight does business.

## Compliance & Enforcement

Compliance with this Policy is mandatory.

Potential violations of this policy are subject to review and investigation by Alight and/or its agents. Violations of this policy may result in discipline, up to and including removal of assignment, end of contract for vendors or termination. This is subject to the procedural requirements of the countries in which Alight operates. Alight reserves the right to refer for prosecution any violations of this policy.

This Policy constitutes the current Policy with respect to its subject matter, and it supersedes and replaces all previous policies relating to its subject matter. Alight reserves the right to modify the Policy at its sole discretion at any time with the intent to update on an annual basis.

## Policy Statements

### Roles and Responsibilities

* 1. Alight Global Business Continuity Management program office  
       
     The Alight Global Business Continuity Management program office (“GBCM”) is the global governing body for business continuity planning. GBCM is responsible for providing guidance and standardized frameworks for business continuity plan development, maintenance, and exercising, and for providing and maintaining a solution for centralized plan retention. GBCM will provide periodic status reports to senior management on the progression of business continuity plan development, maintenance, and exercising.
  2. Alight Businesses

All businesses within Alight are responsible for developing, maintaining, and exercising business continuity plans that adhere to the policy and standards set forth by Alight’s GBCM program office.

Each business unit is responsible for identifying key individuals and succession plans to ensure the following business continuity management, delivery, and support roles are filled.

* + 1. C-Level Executive or Country Manager: has overall responsibility for the strategic and operational management of the organization and will serve as the BC program sponsor, is the ultimate decision maker over budget, and is accountable for all business continuity planning within all business units under their authority.
    2. Executive Business Leader: is the executive sponsor within a specific business responsible for determining planning/recovery budget, prioritizing critical business functions, identifying plan owners and approving recovery strategies. They will also be a decision maker in the execution of business continuity plans.
    3. Executive Plan Owner: management level colleague responsible for the development and management of business continuity plan(s). They are required to participate in annual exercises and plan sign-off and will be responsible for executing recovery strategies in the event of a significant business disruption.
    4. Plan Coordinator: is responsible for coordinating the development and management of business continuity plan(s). They are required to participate in annual exercises and publishing plan documentation. The plan coordinator may also be called upon to assist in the execution of recovery strategies in the event of a significant business disruption.
    5. All Staff: are responsible for cooperating with the implementation of this Policy as part of their normal duties and responsibilities or as assigned within specific business continuity plans.

### Planning and Oversight

* 1. All Alight businesses must develop business continuity plans for their respective operations to ensure swift, organized, and coordinated responses to business interruptions that may affect critical business processes, or loss of facility and/or its people.
  2. Each business unit must evaluate current business operations and implement strategies to reduce exposure or risks to foreseeable incidents that may impact the continuity of business operations.
  3. Each business unit must ensure business continuity is adequately funded and resourced to deliver key planning, maintenance, exercising, and reporting activities.
  4. Each business unit must comply with the Alight Business Continuity standard for the production of the following components:
     1. Risk Assessment (“RA”)
     2. Business Impact Analysis (“BIA”)
     3. Business Continuity Plan (“BCP”) which is comprised of the following components:
        1. Critical Processes
        2. Critical Applications
        3. Logistics (Colleagues, Recovery Strategies, Recovery Locations, Business Resumption Team, and Recovery Actions)
        4. Required Resources (Documents, Equipment, Software, Supplies, Telecom Recovery, and Vital Records)
        5. Call Lists
     4. Each business unit must review the adequacy, effectiveness and currency of the BCPs and their Business Continuity solutions annually or when a major change takes place.
     5. An approved copy of the plan needs to be available to or submitted to the appropriate Regional BC Manager. If required, signatures of approved parties should be on file with the documentation.

### Exercising

* 1. Each business unit must exercise their business continuity plan(s) and execute contact information validation exercises annually to ensure that business continuity plans are up-to-date, effective, and address the needs of the Business. Exercises should be conducted in accordance to tier and GBCM Maturity Model exercise requirements outlined within the Global Business Continuity Standards.
  2. Each business unit must document and submit exercise results utilizing Alight’s Business Continuity exercise framework or in the globally approved alternate framework.
  3. Each business unit must remediate and update the BCP plans in accordance with any deficiencies or issues discovered during the annual exercise. Risk acceptance will be handled by the Global Business Continuity Management program office as is deemed necessary.

### Training & Awareness

* 1. This policy shall be made available to all Alight colleagues.
  2. Alight colleagues are briefed at least annually so they understand the plans they are part of and what will be involved in responding to a situation.
  3. Alight colleagues with a virtual (i.e., virtual or other work from home type) recovery strategy have a duty to take appropriate equipment (i.e., laptops, mobile devices, chargers, files, etc.) home on a daily basis to enable them to continue business operations in the event of a disruption. Alight colleagues should periodically exercise remote working capabilities.

### Maintenance and Management Reporting

* 1. All business continuity plans will be developed, maintained and stored in Alight’s online Continuity & Analytics Management (“CAM”) Tool, <https://enterprise.sungardas.com> or in a globally approved alternate format.
  2. Regional GBCM leaders should be notified of any material changes that occur to business continuity operations, strategies or plans. This includes, but is not limited to creating or removing plans, processes or operating locations.
  3. Regular compliance reporting will be generated by the Global GBCM Program office utilizing the online CAM Tool to create awareness and drive development, exercising and maintenance of business continuity plans according to this Policy.

## Applicable Standards

* None

## References and Mandates

* SEC 17 CFR 240 (2005) – SEC regulations require that financial transaction histories be maintained for all electronic securities transactions, and backup power be in place to maintain continuity. This regulatory requirement is mandatory for applicable entities.
* GLBA: Gramm-Leach-Bliley Act (1999) – Applies to all US financial institutions, which include not only banks, securities firms, and insurance companies, but also companies providing many other types of financial products and services to consumers.
* NYSE Rule 446 / NASD 3510/3520 (2004) – Applies to all members and member organizations of the NYSE or NASD.

## Legal Conflicts

Alight’s Security Policies and Standards were drafted to address the protections found in existing laws and regulations and may be amended as necessary due to law, regulation, or business requirements. There is no intent to conflict with relevant local laws or regulations. In the event of any conflict with relevant local laws or regulations, they will control.

Alight’s Security Policies and Standards may be supplemented by other policies or standards of Alight. In the case of a conflict or ambiguity, the more specific provisions of any such policy or standard shall take precedence over the more general provisions contained in Alight’s Security Policies and Standards.

## Exceptions

Exceptional circumstances occur from time to time. In these situations, contact Global Security Services at [global.security.services@aon.com](mailto:global.security.services@aon.com) for further guidance.

## Document Control Information

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| Document Control Information | |
| Document Name | 400.00 Global Business Continuity Management Policy |
| Primary Contact | Alight Global Security Services [global.security.services@aon.com](mailto:global.security.services@aon.com) |
| Version Number | 1.4 |
| Owner | Alight Global Security Services | Global Business Continuity Management Program Office |
| Author(s) | Mary De Angelo, VP – Global Emergency Operations Center & Global Business Continuity Management  Vickie Reuther, Sr. Manager - Global Business Continuity Management |
| Approved By | Jim Hartley, Chief Information Security Officer |
| Approval Date | May 1, 2017 |
| Effective Date | May 1, 2017 |
| Creation Date | May 2, 2011 |
| Information Classification | Internal / Low Business Impact (LBI) |

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## Revision History

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| --- | --- | --- | --- |
| Revision Level | Date | Description | Change Summary |
| 1.0 | 2012 March | Original | Restructured policy due to Aon Hewitt acquisition |
| 1.1 | 2013 June | 2013 Annual Review | Wording changes to 2.4.4, 2.4.5, 3.2, 4.3 and 5 |
| 1.2 | 2014 July | 2014 Annual Review | Policy has been reviewed |
| 1.3 | 2015 July | 2015 Annual Review | Wording changes to 3.1 |
| 1.4 | 2016 July | 2016 Annual Review | Wording changes from Global Business Continuity / Disaster Recovery (GGBCM/DR) to Global Business Continuity Management (GBCM) and Security Risk Management (SRM) to Global Security Services (GSS) |
| 1.5 | 2017 May | 2017 Annual Review | Rebranded policy due to Aon Hewitt divestiture  Wording changes from Global Business & Technology Resilience to Global Business Continuity Management  Wording changes from Aon plc. to Hewitt Associates LLC.  Policy name changed from Business Continuity Standard to Global Business Continuity Management Policy  Acronym changed from BTR to GBCM |