Global Situation Response Policy

May 1, 2017

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## Purpose

The sustainability of client satisfaction and shareholder value relies on the continuous operation of Alight’s critical and vital business processes and services. Alight has developed a framework for developing global situation response plans supported through established governance and a situation response policy.

The Alight Global Situation Response Policy (“Policy”) establishes Alight’s requirements for maintaining a program that adequately prepares Alight to anticipate and respond to a major crisis or significant business disruptions with protocols that protect the welfare of all Alight colleagues, business operations, reputation, image, in the interests of its shareholders and clients.

This global policy supports efficient business operations, preservation of corporate memory, and compliance with relevant legal and regulatory requirements by mandating development of situation response plans. Situation response plans act as catalysts to sustain critical operations by:

* Identifying critical leaders responsible for decision making and leading situation response activities;
* Documenting incident notification and escalation procedures;
* Formulating and implementing effective response and communication 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 Solutions”). 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 Program Office”) is the global governing body for Situation Response Planning. The GBCM Program Office is responsible for providing guidance and standardized frameworks for situation response plan development, maintenance, and exercising and for providing and maintaining a solution for centralized plan retention. The GBCM Program Office will provide periodic status reports to senior management on the progression of situation plan development, maintenance, and exercising.

* 1. Alight Global Emergency Operations Center (GEOC)

The Alight Global Emergency Operations Center (“GEOC”) is a 24/7 operations center staffed by experienced consultants offering immediate advice, resources, and support to address a wide range of subjects (e.g., travel, security, colleague health and safety, and any other issues that may impact business operations).

* 1. Alight Businesses

All business locations within Alight are responsible for developing, maintaining, and exercising situation response plans that adhere to the policy and standards set forth by Alight’s GBCM Program Office.

Each location is responsible for identifying key individuals and succession plans to ensure the following situation response plan, 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 situation response planning within all business locations under their authority.
    2. Executive Business Leader: is the executive sponsor within a specific business and is 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 situation response plans.
    3. Executive Plan Owner: must be of management level and is responsible for the development and management of situation response 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 situation response 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. Local Situation Response Team: is responsible for managing and coordinating the overall response to a situation at a location, until it is under control or contained without impact to the business, including execution of business continuity and/or other supporting plans until normal operations have been restored.
    6. 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 plans.

#### Planning and Oversight

* 1. All Alight business locations must develop a Situation Response Plan for their respective location to ensure swift, organized, and coordinated responses to business interruptions that may affect critical business processes, loss of facility, and/or its people.
  2. Each business location 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 location must ensure situation response is adequately funded and resourced to deliver key planning, maintenance, exercising, and reporting activities.
  4. Each business location must comply with the Alight standard for the production of the following components:
     1. Situation Response Plan (“SR”) comprised of the following components:
        1. Assign team members to the Situation Response Team to coordinate activities should the plan be activated.
        2. Contact information will automatically be included in plans as part of Situation Response Team assignments. Colleagues must keep contact information updated in Workday.
        3. Standard Program Office issued documents that support the situation response plan framework and plan activation.
     2. Each business location must review the adequacy and currency of the SR plans annually or when a major change takes place.
     3. An approved copy of the plan needs to be available to or submitted to the appropriate Regional GBCM Manager. If required, signatures of approved parties should be on file with the documentation.

#### Exercising

* 1. Each business location must exercise their SR plan and execute call cascades annually to ensure that plans are up-to-date, effective, and address the needs of the location. Exercises should be conducted in accordance to requirements outlined within the Situation Response Standards.
  2. Each business location must document and submit exercise results utilizing Alight’s Situation Response exercise framework or by using the globally approved template for business units on an alternate approved framework.
  3. Each business location must remediate and update the SR plans in accordance with any deficiencies or issues discovered during the annual exercise. Risk acceptance will be handled by the GBCM Program Office as 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 situation response plans will be developed, maintained, and stored in Alight’s online Continuity & Analytics Management (“CAM”) Tool, [https://enterprise.sungardas.com](https://enterprise.sungard.com/) or in a globally approved alternate format.
  2. Regional GBCM leaders should be notified of any material changes that occur to situation response operations, strategies or plans. This includes, but is not limited to creating or removing plans, colleagues, teams or operating locations.
  3. Regular compliance reporting will be generated by the 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

## Related Documents

* Global Business Continuity Management Policy
* Global Business Continuity Management Standard
* Global Situation Response Standard

## References & Mandates

* None

## 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** | |
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| Author(s) | Mary De Angelo, VP – Global Emergency Operations Center & Global Business Continuity Management  Vickie Reuther, Sr. Manager - Global Business Continuity Management |
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## Revision History

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| --- | --- | --- | --- |
| **Revision Level** | **Date** | **Description** | **Change Summary** |
| 1.0 | 2012 January | Original | Restructured policy due to Alight Hewitt acquisition |
| 1.1 | 2013 June | 2013 Annual Review | Changed wording to include Situation Response.  Changed wording 3.3 and 5  Added 2.4.3 and 4.3 |
| 1.2 | 2014 July | 2014 Annual Review | Changed Crisis Management to Situation Response and updated wording |
| 1.3 | 2015 July | 2015 Annual Review | Purpose section fixed a grammatical error.  Updated 2.4.1 to reflect new Situation Response Plan Framework (removed Logistics and Required Resources, promoted Team Members and Call Lists).  Promoted 2.4.1.3 to 2.4.2 and changed call lists to contact information, also included verbiage about Workday updates.  Promoted 2.4.1.4 to 2.4.1.3. |
| 1.4 | 2016 July | 2016 Annual Review | Replaced all instances of Global Business Continuity and Disaster Recovery (GBCM/DR) with Global Business Continuity Management (GBCM) to reflect name change. Also, replaced all instances of Security Risk Management (SRM) with Global Security Services (GSS) to reflect new organizational name. |
| 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  Policy name changed from Business Continuity Standard to Global Business Continuity Management Policy  Acronym changed from BTR to GBCM |