Global Situation Response Standard

May 1, 2017

Table of contents (“TOC Header”)

[Related Policy 3](#_Toc488666121)

[Purpose 3](#_Toc488666122)

[Standard Statements 3](#_Toc488666123)

[1. Roles and Responsibilities 3](#_Toc488666124)

[2. Situation Response Plan Development and Oversight 4](#_Toc488666125)

[3. Situation Response Plan Exercising 5](#_Toc488666126)

[4. Training & Awareness 6](#_Toc488666127)

[5. Maintenance and Management Reporting 6](#_Toc488666128)

[Legal Conflicts 7](#_Toc488666129)

[Exceptions 7](#_Toc488666130)

[Comments 7](#_Toc488666131)

[Related Documents 7](#_Toc488666132)

[References and Mandates 7](#_Toc488666133)

[Document Control Information 8](#_Toc488666134)

[Revision History 9](#_Toc488666135)

## Related Policy

* 402.00 Global Situation Policy

## 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 business continuity management standard.

The Alight Global Situation Response Standard (“Standard”) defines Alight’s standard 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. Incidents are reported and managed through Alight’s Global Emergency Operations Center (GEOC).

## Standard 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 management on the progression of situation plan development, maintenance, and exercising.

* 1. Global Emergency Operations Center

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 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 Global Business Continuity Management Program Office.

Each location is responsible for identifying key individuals to fill the following situation response plan, delivery, and support roles.

### Situation Response Plan Development and Oversight

* 1. All business locations within Alight are responsible for developing, maintaining, and exercising situation response plans.
  2. Each location is responsible for identifying key individuals and succession plans to ensure the 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.
  3. Situation Response plans must be developed utilizing the Global Business Continuity Management Program Office’s Continuity & Analytics Management (“CAM”) tool and/or template located at https://enterprise.sungardas.com or by using the globally approved template for business units on an alternate approved framework. At a minimum, plans must identify and document the following components:
     1. The SR Team is used to help provide organization and structure to recovery activities or tasks within the Situation Response Plan. Teams are comprised of a team leader, team member positions, and alternates. Representation from each core business unit at the location should be identified within the team member structure provided. People assigned to the team positions should be qualified individuals who can execute or manage the tasks assigned to the team.
     2. Documents: identify and include as supplemental reference information for the situation response team or other leaders if and when this plan is activated.
     3. Contact information will automatically be included in plans as part of Situation Response Team assignments. Colleagues must keep contact information updated in Workday.
     4. Required approval signatures.
     5. Standard Program Office issued documents that support the situation response plan framework and plan activation.
  4. 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. This copy will be retained on file with the Alight Global Business Continuity Management Program Office and within the Plan Management Details of the Continuity Analytics Management tool. It will also be used to provide management with compliance statistics.

### Situation Response Plan Exercising

* 1. Each business location must exercise their situation response plan and execute contact information validation exercises annually to ensure that plans are up-to-date, effective, and address the needs of the location. Exercises will align to the GBCM Maturity Model exercise levels.
     1. Level 0 - Exercises and tests have not been conducted.
     2. Level 1 - Exercises and tests are conceptual in nature with no formal documentation. Call tree/cascade testing is conducted. (Example: checklist exercise or gap assessment, or peer review)
     3. Level 2 - Exercises and tests use document-based discussions. (Example: structured walk-thru, tabletop (paper) exercise or desktop (paper) scenario)
     4. Level 3 - Exercises and tests are focused on individual plan effectiveness under simulated operating conditions. (Example: standalone test)
     5. Level 4 - Exercises and tests focused on recovery actions of inter-related business operations (plans) under simulated disaster conditions. (Example: simulation, mock disaster, or operational testing)
     6. Level 5 - Exercises and tests simulating recovery actions under simulated/modified operating conditions. Business operates in recovery mode to support production operations, including return to normal operations. (Example: integrated testing or exercising and full rehearsal)
  2. Each business location must document and submit exercise results utilizing Alight’s Situation Response exercise framework. Forms are supplied by the Regional GBCM Leader and/or Global Program Office.
  3. Each business location must remediate and update its situation response plan(s) in accordance with any deficiencies or issues discovered during the annual exercise or after plan execution. Risk acceptance will be handled by the Global Business Continuity Management Program Office as deemed necessary.

### Training & Awareness

* 1. Plan owners are responsible for ensuring Alight colleagues within their business location’s situation response plan are briefed at a minimum annually or when significant changes occur, so they understand the plans they are part of, and what will be involved in responding to a situation.
  2. Alight colleagues with a virtual (i.e., work from home or alternate location) 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 test remote working capabilities.
  3. For further information and guidance on Situation Response plan development and exercising (including specific region or country requirements), and the use of the Continuity & Analytics Management (“CAM”) Tool, refer to your Regional GBCM Manager.
  4. Questions regarding this Standard should be directed to the Alight GBCM Program Office.

### Maintenance and Management Reporting

* 1. Situation Response plans for all sites must be reviewed and maintained on an annual basis or as significant changes occur that may affect or influence the plan.
  2. All Situation Response plans must 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.
  3. 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.
  4. 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 Standard.

## 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.

## Comments

* None

## Related Documents

* Global Situation Response Policy
* Global Business Continuity Policy

## References and Mandates

* None

## Document Control Information

|  |  |
| --- | --- |
| **Document Control Information** | |
| Document Name | 402.01 Global Situation Response Standard |
| Primary Contact | Global Security Services  [global.security.services@aon.com](mailto:global.security.services@aon.com) |
| Version Number | 1.5 |
| 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) |

## Revision History

|  |  |  |  |
| --- | --- | --- | --- |
| **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 | Changed wording to include Situation Response.  Changed wording 2.3, 2.4, 3, 4 and 5 |
| 1.2 | 2014 July | 2014 Annual Review | Changed Crisis Management to Situation Response and updated wording |
| 1.3 | 2015 July | 2015 Annual Review | Updated URL in 2.3  Removed sections 2.3.1.1 – 2.3.2.3 to align with updated Situation Response Framework.  Promoted Teams to 2.3.1, Documents to 2.3.2  Updated punctuation in 2.4  Updated 3.1 wordsmith and added 3.1.1-3.1.6 to include language on BCM Maturity Model for exercises.  Promoted 2.3.1.3. Teams to 2.3.1Policy has been reviewed |
| 1.4 | 2016 July | 2016 Annual Review | Replaced all references to Global Business Continuity & Disaster Recovery (GBCM/DR) with Global Business & Technology Resilience (BTR) to reflect the new name. Also, replaced all instances of Security Risk Management (SRM) with Global Security Services (GSS) to reflect the new organizational name. |
| 1.5 | 2017 May | 2017 Annual Review | Rebranded Standard due to Aon Hewitt divestiture  Wording changes from Global Business & Technology Resilience to Global Business Continuity Management  Standard name changed from Business Continuity Standard to Global Business Continuity Management Standard  Acronym changed from BTR to GBCM |