# Physical Security Policy

## Purpose

The principal objective of Alight’s physical security strategy is to ensure that acceptable levels of physical security are maintained and that the responsibility for delivering appropriate security measures is clearly understood. Specifically, these measures include the effective use of people, technology, policies and procedures which help towards achieving optimized physical protection.

This document establishes global policies for the physical security of Alight’s facilities and the information in Alight’s custody. Alight’s physical security program is a systemic application of various effective physical security measures designed to provide layers of protection, interdependent, to mitigate the risks and threats to the company, and to ensure compliance with business, client and regulatory security requirements or legislation. Physical security policies, guidelines, processes and procedures are developed to ensure a consistent approach across the enterprise to effectively mitigate and respond to threats and risks. The risk assessment process ensures that the cost and complexity of the measures and procedures applied are both commensurate with and effective against the risks they are designed to protect.

## 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 (contractors, 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 disciplinary action, up to and including termination of employees or removal of assignment or end of contract for vendors and contractors 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

### Global Facilities Physical Security Policy

* 1. Alight must continuously minimize the level of risk to its colleagues and facilities by actively identifying and mitigating vulnerabilities that threaten Alight's operations.
  2. In coordination with the Alight business, the Global Security Services (GSS) Global Protection Services (GPS) team will conduct a formal physical security assessment to identify and assess the physical security risks and vulnerabilities that exist for the local business operation, as well as evaluate the physical security posture of the facility location. The completed risk assessment will be presented to the local business leader(s), as the Risk Owner, and will include an action plan to mitigate the identified physical security risks and vulnerabilities to Alight’s people, property and information. GPS will consult, collaborate and support the local business in mitigating the identified physical security risks.
  3. In conjunction with the action plan, the local business at each facility location will minimize risk by:
     1. Establishing and maintaining a physical security program
     2. Ensuring that acceptable levels of security are maintained in accordance with GSS GPS documented standards (see Applicable Standards section at the back of this policy)
     3. Ensuring that the responsibility for delivering appropriate security measures is clearly understood
     4. Designating a physical security champion(s) to liaise with GSS GPS and the local business(es) to support and enable ongoing implementation and delivery of GPS standards, risk mitigation programs and services locally
     5. Using people, technology, policy, and procedures effectively to achieve physical protection
     6. Understanding, mitigating, or formally accepting certain risks and threats to the company
     7. Ensuring compliance with business, client and regulatory security requirements or legislation
     8. When necessary, upgrade systems and technology onto the GSS GPS enterprise platform
  4. Secure areas must be defined and designated based on the sensitivity level of information being stored or processed in them.
  5. Perimeter controls must be established to limit access to sensitive information to authorized personnel.
  6. Environmental controls, including but not limited to Heating Ventilation and Air Conditioning (HVAC), power, fire detection and suppression, must be implemented in order to ensure the availability of information systems.
  7. All physical security systems must comply with all applicable regulations such as, but not limited to, building codes and fire prevention codes.
  8. Physical access to all Alight restricted areas must be documented and managed.
  9. All Alight facilities must be physically protected in proportion to the criticality or importance of their function as defined by the Physical Security Control Levels.
  10. Access to Alight facilities must be granted only to Alight colleagues and vendors/contractors whose job responsibilities require access to that facility.
  11. All Alight facilities that allow access to guests will record guest access on a formal access log. Guests are authorized to access Alight space if escorted at all times by an active Alight colleague or long-term contractor.

## Applicable Standards

* 300.01 Physical Access Control Standard
* 300.02 Physical Security Systems and Space Design Standard
* 300.03 Emergency Response Standard
* 300.05 Physical Security Equipment Maintenance Standard
* 300.06 Security Guard Operations Standard
* 300.08 Physical Security Audits & Compliance Standard

## References & Mandates

* GSS GPS Physical Security Levels and Standards Application

## 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

Application of the global physical security policies and standards may vary by region and office, and exceptions and variations may occur, if and when approved by GSS GPS. Please contact GSS GPS at [global.security.services@aon.com](mailto:global.security.services@aon.com) for further guidance on any exceptions or variations that may apply.

## Communications

Questions regarding this Policy should be directed to GSS GPS at [global.security.services@aon.com](mailto:global.security.services@aon.com).

# Document Control Information

Document Control Information

|  |  |
| --- | --- |
|  |  |
| Primary Contact | Alight Global Security Services | [global.security.services@aon.com](mailto:global.security.services@aon.com) |
| Version Number | 1.6 |
| Owner | Alight Global Security Services | Global Protection Services |
| Author(s) | Alight Global Security Services | Global Protection Services |
| 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 | General Internal – Low Business Impact (Green) |

# Revision History

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 | Reviewed and validated |
| 1.2 | 2014 June | 2014 Annual Review | Reviewed and validated |
| 1.3 | 2015 June | 2015 Annual Review | Reviewed and validated |
| 1.4 | 2016 August | 2016 Annual Review | Clarified wording and replaced all instances of Security Risk Management (SRM) with Global Security Services (GSS) to reflect new organization name |
| 1.5 | 2017 January | 2017 Update | Name change from Corporate Protection Services (CPS) to Global Protection Services (GPS) |
| 1.6 | 2017 May | 2017 Rebranding | Rebranded policy due to Aon Hewitt divestiture |
|  |  |  |  |