# Global Protection Services Investigations Policy

**Purpose**

Alight must support the review and investigation of allegations, incidents and situations that may place Alight or its client’s assets and information at risk. Alight is committed to conducting lawful investigations and providing an incident reporting and case management system by which investigations can be recorded and tracked. The purpose of this Policy is to define Alight’s Global Security Services (GSS) investigation role in the global protection services investigations process.

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

### General

* 1. Ensure thorough GSS Global Protection Services (GPS) Investigations are performed. With the review and consent of GSS Leadership and the Alight Law Department, wherever possible, prosecute offenders and pursue restitution.
  2. A program will be in place to provide the ability to quickly:
     1. Collect data
     2. Protect evidence
     3. Examine the data and document findings
     4. Analyze findings
     5. Accurately report conclusions
  3. Ensure the responsibility for delivering GSS Global Protection Services Investigations is clearly understood and assigned.
  4. Effectively use people, technology, policy, and procedures to achieve GSS GPS Investigation goals.
  5. Identify certain risks and threats to the company, where possible.
  6. Ensure compliance with business, client, and regulatory requirements.
  7. Ensure adequate company resources are made available to support the program.

Applicable Standards

* 302.01 Global Protection Services Investigations Standard (Internal & External)

References & Mandates

* Police & Criminal Evidence Act
* Data Protection Act
* Regulation of Investigatory Powers Act

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 of Alight 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

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| Primary Contact | Alight Global Security Services | [global.security.services@aon.com](mailto:global.security.services@aon.com) |
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| Author(s) | Alight Global Security Services | Global Protection Services |
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# Revision History

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 | 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 June | 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 |
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