# Global Protection Services Investigations Standard

Related Policy

* 302.00 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 Standard is to outline Alight’s standards for conducting Global Security Services (GSS) Global Protection Services (GPS) Investigations.

GSS Global Protection Services Investigations is a support process interconnected to reported situations, which have potential to cause impact to Alight’s business. The process is designed to collect and maintain data, analyze the collected information, identify actual or potential risks and provide accurate conclusions.

GSS Global Protection Services Investigations will also make recommendations intended to prevent recurrence and reduce further risk to the company and / or Alight colleagues.

Standard Statements

### Global Protection Services Investigations

* 1. Investigations shall be conducted:
     1. With the understanding that time is of the essence.
     2. In accordance with the law and the highest moral principles.
  2. Investigators shall observe the precepts of truthfulness, honesty, and integrity.
  3. Investigators shall be competent and diligent in discharging their professional responsibilities.
  4. Investigators shall be trained in interviewing techniques. Interview training courses investigators attend must be approved by GSS GPS Leadership.
  5. All reports of incidents will be reviewed for potential investigative need within 48 hours of receipt when possible.
     1. Reports of incidents received for investigation may come from a variety of sources – both internal and external.
  6. All incident reports will be evaluated for accuracy and completeness of information, with consideration given to additional information that may be necessary to formulate an investigative plan.
  7. Investigations will encompass any Alight related incident that requires the collection of evidence, documentation of facts, and analysis of data.
     1. To best facilitate a timely, responsive, and productive investigative process, investigations will be separated into “Internal” and “External” investigations.
     2. Internal investigations shall be generally defined as those investigations having limited scope, and are typically related to incidents arising out of workplace activities.
     3. External investigations shall be generally defined as having a much broader scope and potential for significant impact to Alight client relations, operations, and/or Alight brand and reputation.
  8. An investigative case plan will be created, with consideration given to those that will collaborate with the investigation during the inquiry, whether GSS Global Protection Services Investigations will lead or support an investigation, and what GSS GPS resources will be involved.
     1. Consideration will be given to the nature of the incident, the necessity for an investigation, and an understanding of the actual or potential impact to Alight’s stakeholders, facilities, operations, and/or reputation.
     2. Investigative priority will be given to those cases, which present the largest risk to the firm and/or its Alight colleagues.
     3. Priority will be given to mitigating any actual or potential costs to the firm associated with a protracted investigation.
  9. The objectives of the investigation are to quickly, fairly, and impartially gather data for analysis, with a reasonable confidence that any analysis of the information will lead to an appropriate conclusion.
  10. Interviews of involved parties during the investigation will be conducted in partnership with the appropriate internal and/or external resources (i.e., Law Department, Human Resources, Internal Audit, contractors, law enforcement, etc.) with the objective for fair and accurate gathering of statements.
  11. The investigation will provide a clear depiction of the information gathered during the inquiry through documenting investigative notes, witness and suspect information, interviews, and other pertinent data.
  12. The investigation may identify any recommendations / corrective actions, where applicable, to prevent reoccurrence and mitigate further loss or risk to the company, client, and/or Alight colleagues.
  13. Written GSS Global Protection Services investigation reports must be documented in Alight’s incident and investigation case management system.
      1. Where possible, other case documentation including interview notes, evidence, etc., should save as file attachments in the same reporting system. If in hardcopy, refer to 1.14.
      2. All information regarding case files must be restricted to those with a need to know access level.
  14. Documents, hard copies of records, and/or other evidence associated with investigative efforts will be maintained in a secure inventory.
      1. Evidence will be handled safely and securely and a complete chain of custody will be documented to maintain the evidence’s authenticity.
      2. Any items placed into inventory will be disposed of appropriately once any need for the evidence has passed.
      3. The length of time the items remain in inventory will be subject to any limitations by legal, regulatory and/or legislative bodies, and may vary by case.
  15. Senior Leadership within the Global Security Services organization will be briefed on open and closed case investigations on a routine basis.
  16. Investigations will be placed in a closed status only with the approval of the VP – Global GPS or other designated GSS GPS Leadership.
  17. Matters dealing with violations of criminal law will be referred to the appropriate law enforcement authorities upon approval of GSS GPS leadership and Alight Law Department.
      1. Investigators will fully support law enforcement and prosecutorial efforts to pursue criminal and/or civil litigation when investigations have been referred for prosecution.
  18. As part of a post-investigation review, investigators will provide the necessary assistance and guidance to management for any issues arising from the original incident.
  19. Upon appropriate request and approval, available historical investigative case data will be provided.
  20. Upon appropriate request and approval, GSS GPS Investigations will provide investigative support and/or consulting to other internal practices and/or external organizations.

### Evidence Retention

The cornerstone of any investigation is the collection and preservation of evidence. Evidence collected during an inquiry is typically used to substantiate an investigative finding. Evidence collected by GSS GPS Investigations consists of two main types:

* Physical evidence (primarily documents, computer components, and other physical items)
* Digital evidence (primarily in the form of network data, Notes databases, call recordings, etc.)

It is recognized that evidence collection is not practical or necessary in all cases. The need to capture and preserve the evidence is best evaluated based upon the severity of the issue being investigated. A primary focus is to properly capture, analyze, and preserve digital evidence.

GSS GPS Investigations presently maintains facilities for the preservation of evidence under lock and key, and maintenance of a chain of custody. Alight uses "chain of custody" forms for critical evidence (i.e., hard drives, digital evidence, etc.) and has forensic capabilities that permit the company to capture and store that crucial evidence, including deployable digital incident response evidence kits (Alight has several "write blockers" and encrypted, secure USB drives). Alight also has a forensic workstation available for data analysis, which is designed to properly maintain the integrity of the evidence.

* 1. Items critical in supporting investigative findings must be properly collected and stored so that they will withstand legal challenge.
  2. Any collected evidence must be maintained in a way that it can be tested by independent parties with confidence that the evidence provided is the same evidence that was collected during to the investigation. This requires that evidence is:
     1. Collected in a manner so that the collection process does not compromise the validity of the evidence
     2. Stored in a manner which maintains the evidence, as nearly as possible, to its original collected state
     3. Handled in a way that clearly demonstrates the evidence could not have been accidentally or deliberately altered or substituted
  3. Investigators and the investigative process shall safeguard confidential information and exercise due care to prevent its improper disclosure.

Communications

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

# 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.

## Applicable Standards

* HR Compliance Investigative Protocol Standards

References & Mandates

* None

# Document Control Information

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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# 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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