

Global Investigations Policy

Purpose

The Investigations Policy supports our Company by helping ensure that the conduct of its business and its people are ethical and that they comply with all Company policies, as well as all legal and regulatory requirements. This activity supports the business by maintaining and protecting our reputation, minimising losses and legal risks, and optimising operational efficiency.

Our Commitment

Whilst investigations are sometimes necessary to protect and enable the business and employees, they should be conducted and governed in accordance with our values. We are committed to protecting our people, property, assets, brands, and reputation by ensuring we have an effective and robust investigations process that is delivered with humanity. Investigations will always be implemented in accordance with our Code of Conduct, our values and human rights legislation.

When a concern is received, either through Speak Up or any other channel, our investigative principles of humanity, confidentiality, proportionality, and non-retaliation are applicable to all matters raised by employees. Every concern will be taken seriously and assessed by colleagues in Security, Investigations and Resilience, Legal and HR, and, if appropriate, a formal investigation may take place. If an employee wishes to remain anonymous, appropriate measures will be taken to protect their identity. There is zero tolerance towards behaviour which could be perceived as retaliation or harassment during the course of, or after, an internal investigation. Sometimes concerns may be raised that turn out to be unfounded. This should not deter employees from speaking up: it is better to raise all concerns, as long as the information is provided in good faith. Good faith reporting does not mean that you must be right when you raise a concern. Good faith reporting means that you believe that the information you are providing is accurate and truthful.

Scope

This Policy serves as the overarching investigations policy for the Company governing the manner in which all internal investigations are managed.

What do you need to know / do?

What is an investigation?

An investigation consists of systematic, objective, and impartial research into an issue or concern. Fact finding will be undertaken when there is a need to establish the facts and/or understand whether any wrongdoing has occurred and, at times, to enable legal advice to be provided to the organisation. A timely and proportionate investigation will present the facts in a way which may, through the subsequent disciplinary process, prove or disprove an allegation or exonerate the actions of those involved. Because these are serious matters that may have potentially serious consequences, investigations need to be handled with a balance of rigour and sensitivity.

Investigative Principles

There may be occasions when allegations or evidence surfaces of inappropriate, illegal or unethical behaviour, misconduct or policy breaches by Company employees, complementary workers or business partners, which will need to be investigated. All investigations will be handled in accordance with the principles set out in this Policy:

Principle	Definition
Humanity	Everyone involved in an investigation deserves to be treated with respect and dignity. The investigation process has the potential for negative impact on all parties involved. Investigators should be mindful of this and conduct all activity as expeditiously as possible, treating all parties with respect and humanity throughout the process.
Confidentiality	Details of an investigation will only be shared with those who have a need to know. Apprising stakeholders of the investigation's progress will generally be avoided so as not to compromise the integrity and independence of the investigation. Investigators must be impartial and avoid real or perceived conflicts of interest.
Proportionality	The extent of the investigation will be proportionate to the allegation. Issues and concerns should be addressed promptly, but not rushed, and resolved at the lowest appropriate level. Managers are accountable to address and resolve concerns brought to their attention. This allows faster decision-making, improved employee experience and better use of resources.
Non-retaliation	There is zero tolerance towards behaviour which could be perceived as retaliation or harassment during the course of, or after, an internal investigation. Where appropriate, safeguarding precautions can be put in place such as a temporary change of reporting lines, work location, and/or suspension from the workplace. If, during the investigation, a report or allegation of retaliation against the person who reported the concern, or any other witness or person involved in the investigation is received, the alleged retaliation will be immediately and thoroughly investigated.

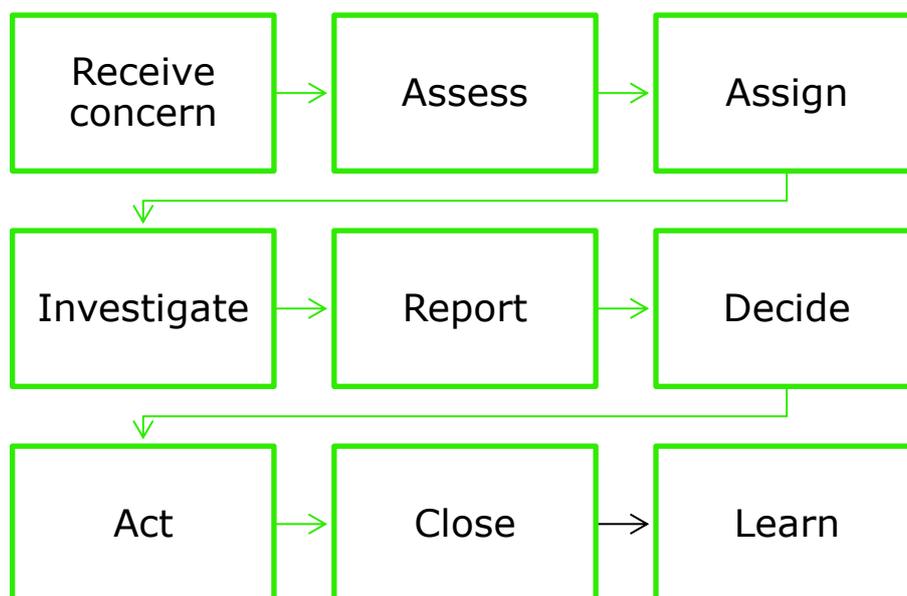
Investigations Written Standards Framework

This Policy provides the principles by which any investigation will be conducted within our Company. It sets the context for the more detailed written standards that follow in the hierarchy below, including Standard Operating Procedures (SOP) with specific guidance on the grievance and disciplinary process.

Written Standards Framework	
Policy	Global Investigations Policy
Standard	End-to-End (E2E) Concerns Management Process
Standard Operating Procedures	Grievance SOP Discipline SOP
Work Instruction (WI)	Investigations WI Local HR WI

Concerns Management Process

Investigative fact finding is an integral part of the End to End (E2E) concerns management process.



While the process remains the same, investigations may be conducted by different parts of the business depending upon the nature of the concern. In general, concerns will be resolved at the lowest level possible. As well as the central investigations team within the Security, Investigations and Resilience function, investigations may be conducted by line managers, HR, Compliance, Legal or Privacy. The E2E concern management process is explained in more detail in the associated written standard. There will be occasions where legal advice is required and/or concerns give rise to a risk of litigation. In such circumstances, the investigation will be led by Legal, under legal privilege. Privilege is a legal right that allows the organisation to resist compulsory disclosure of documents and information, which in turn allows for the provision of sound legal advice. More detail on grievances and discipline can be found in the associated SOPs.

What monitoring is required for this Policy?

The investigations governance framework provides effective oversight of all aspects of the investigations process at our Company. Key stakeholders, including Legal, Compliance, HR, Tech and Forensics, are involved throughout the governance structure to ensure that accountability and authority in decision-making, appropriate allocation of resources and delivery of best practice are achieved. The governance framework includes an Incident Classification Group (ICG), an Investigations Steering Committee (ISC) and a bi-annual Security, Investigations and Resilience Governance Board (SGB).

Document Revision History

REVISION (Principal Changes from last revision)

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 Technical changes impacting
 Roles and responsibilities
 Process or activities

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Review & Approvals

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