

# Group Escalation and Investigation Policy

## Objective

The purpose of this policy is to set the framework by which the Group can conduct investigations that are in line with its regulatory and legal obligations, while meeting the demands of a competitive commercial organisation. The principles set out in this policy are, therefore, designed to enhance commercial opportunity, while minimising corporate risk.

## Principles

All Business Units (BUs) and Local Business Units (LBUs) are required to have in place a process to:

- Report security issues to Group Security;
- Co-ordinate with local operational risk teams where such events meet or exceed the reporting thresholds set out within the Group Operational Risk policy;
- Ensure that investigations are carried out by appropriately trained and experienced investigators and are proportionate, independent, objective, lawful; and
- Ensure investigations are recorded and tracked to conclusion and available for investigation Quality Assurance review.

The policy outlines requirements for BU/LBUs relating to escalation requirements and minimum investigation controls commensurate with its regulatory and legal obligations.