

# COMPLIANCE INVESTIGATIONS TRIAGE MATRIX

## INVESTIGATION TRIAGE SYSTEM

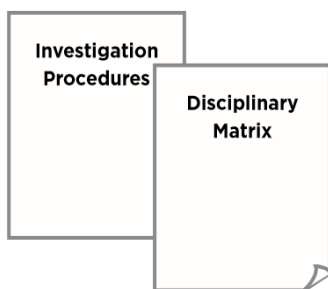
Complaints regarding workplace conduct fall into several categories. These include complaints that may violate our Code of Business Conduct and Ethics or legal requirements, allegations involving other policy violations, and concerns regarding workplace conduct more generally. Some of these warrant formal investigations; others less formal measures by relevant functional units or human resources. This Triage Matrix identifies the division of labor in addressing these various concerns.

In making that assessment, there are three primary criteria:

1. The significance of the allegation - whether it alleges violations of the Code of Business Conduct and Ethics or legal requirements, the position of the individual involved, and whether the risk is systemic – as indicated in the chart below
2. Whether the allegation, if true, may create legal exposure or significant reputational risk.
3. Whether the business could handle the activity more efficiently than compliance

**TRIAGE LOW-RISK WORK TO THE BUSINESS**

<b>MATRIX</b>			
<b>FACTORS</b>	<b>Determine significance of allegation</b>	<b>Identify legal &amp; reputational risks</b>	<b>Assess business capacity allocate task</b>
<b>Risk Category</b>	High risk or impact misconduct (eg bribery, public disclosure)	Medium risk or impact misconduct (e.g third party due diligence violation)	Low risk or impact misconduct (e.g breaches of internal procedures)
<b>Position in the business</b>	Senior leadership (e.g., Executive Director, General Manager, President, Senior Vice President, COO, CFO, etc.) or gatekeepers (legal, finance, audit)	Positions of trust and managers (e.g., operations managers, functional managers on site or in-country, safety, security, community, govt affairs, etc)	Others
<b>Geographic or Functional Scope</b>	Indicative of systemic problems, significant control failures at Business Unit level or above	Country level or site level	Others
<b>Classification</b>	<b>PRIORITY A</b> Referred to external legal counsel	<b>PRIORITY B</b> Handled by Compliance in partnership with the business	<b>PRIORITY C</b> Referred to local business owners



**Workshop: Using the Disciplinary Matrix**  
*Session Agenda*

1. Background on disciplinary matrix.
2. Introduction to scenario...

**From:** Business Unit Leader  
**To:** CCO  
**Subject:** Need to escalate investigation #4702

## VERIFY FAIRNESS AND EFFECTIVENESS



Business submits draft results to compliance



Compliance reviews findings of business's inquiries.



Compliance provides the business with feedback on its inquiries.

### TRUST AND VERIFICATION

Compliance tracks matters after they are triaged, reviewing the interim findings and post-completion results for reasonableness in process and outcomes.

## BENEFITS OF INCREASED BUSINESS INVOLVEMENT IN MANAGING CONCERNS

### Compliance

Increased time to spend on high-risk and high-stakes investigations

Increased time to spend on emerging risk areas, such as human rights

Increased presence of compliance themes in company culture

Increased visibility into business operations and their impact on compliance activities

### Business

Give management greater insights into issues and concerns

Increased engagement with compliance activities, resulting in reduced risk

Increased visibility into matters of concern

Increased speed with which investigations are concluded

## IMPROVEMENT OPPORTUNITIES

### Clarify Investigations Roles and Responsibilities

1. Engage in cross-functional dialogue to identify optimal risk owners.
2. Coordinate with other assurance functions to minimize conflicting risk management expectations for business partners.
3. Build a framework to distinguish tasks requiring compliance expertise from those that can be transferred to the business.