



Code of Business Principles Investigating Code Breaches



Responsibility for investigating Code breaches

Our Business Integrity Committees oversee investigations of all potential breaches of our Code of Business Principles and 24 Code Policies, except where senior executives are involved (where our Chief Legal Officer and Chief Business Integrity Officer oversee investigations).

The role of our Business Integrity Committees

Each Business Integrity Committee is responsible for ensuring the timely investigation of all alleged or suspected Code breaches by an individual employee – with a view to reaching a final determination within 60 days.

The Committees ensure that all investigations are conducted in a transparent, consistent, objective and fair manner.

How do we manage allegations of Code breaches?

Once an allegation is received it is acknowledged, reviewed and an initial analysis of the allegations conducted by the appropriate Business Integrity Officer.

Where appropriate, the Business Integrity Officer then consults the Business Integrity lead for their 'cluster' to determine whether a BI investigation is required and, if so, who should be part of the investigation team. (A cluster is our country group, for example Europe or Africa.) All investigations of a suspected Code breach are carried out or overseen by a Business Integrity Officer. Where appropriate and possible, we aim to provide the reporter with an anticipated timescale for completion, while at all times maintaining the confidentiality of the process.

The investigation report links the allegation(s) to the specific requirements under the Code, summarising the evidence, findings in respect of any breach, corrective measures and recommended sanctions. Once completed, the Business Integrity Officer submits the investigation report and associated evidence to the relevant Business Integrity Committee for review.

The Business Integrity Committee concludes on both the investigation findings and, if relevant, whether any recommended individual sanctions are justified.

What happens if an allegation is substantiated?

In all circumstances where the Business Integrity Committee agrees that a Code breach is substantiated, the Committee determines the appropriateness of the recommended



sanction, taking account of individual circumstances and related aggravating and mitigating factors as set out in our Business Integrity Sanctions Standard.

Escalation of cases or other Business Integrity matters for decision to the Business Integrity Committee at the next level up should only be by exception, where the ability of the initiating Committee to resolve the matter is compromised, for instance in situations where:

- members of our Leadership Team or other senior employees may be implicated
- the risk or control failure is complex and expands beyond the geography
- the independence of the initiating Business Integrity Committee is or could be perceived to be compromised; or
- the initiating Business Integrity Committee finds a case particularly challenging so is unsure about how to proceed and requires advice or support.

For further detail, see [Business Integrity](#)