

BREACH MANAGEMENT FRAMEWORK – CASE STAGES

Please note, this framework is only applicable once a case cannot be resolved through regular compliance procedures

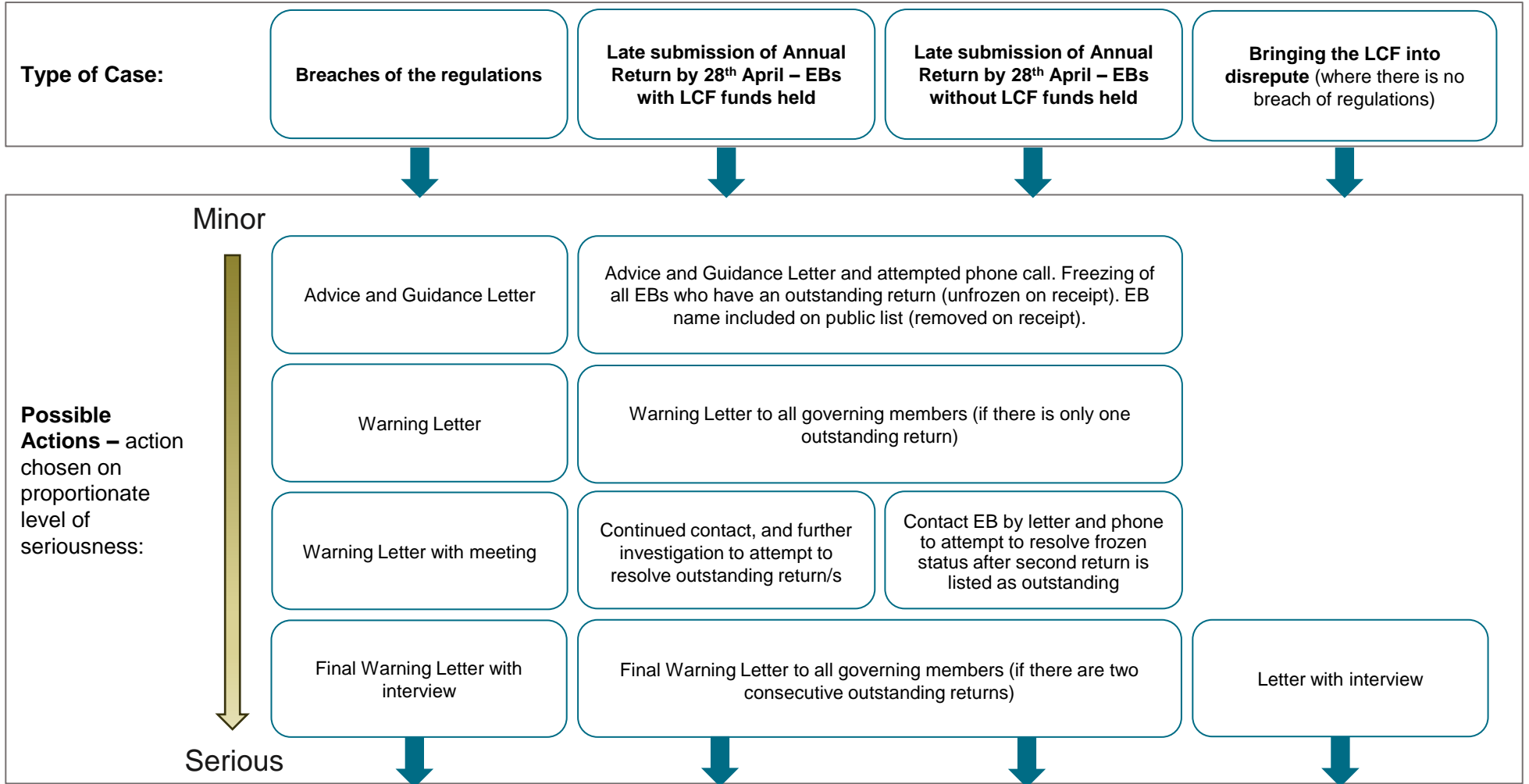
Stage	Description/Actions	Approved By	Target Timescale	External Contact
Stage 1 – Initial Assessment	RO to compile and present initial assessment - triage to case type A, B, C, or No Breach	CM/PRM	2 weeks	EB Executive if required: by phone and follow up email
Stage 2 – Review	RO to Review case fully and ask for information if required - create timeline and structured case file	CM/PRM	A - 2 Weeks B - 6 Weeks C - 12 Weeks	Case A & B - EB Executive Case C - EB Executive and board by Formal Letter Template
Stage 3 - Determination	RO to complete determination section of the matrix and hold internal case conference to discuss findings	A – CM/PRM B/C - CM/PRM/ CEO	2 Weeks	EB Executive and board: by Formal Letter Template
Stage 4 - Review of actions and Implementation	Implement and work with EB through agreed resolutions	CM/PRM	As Case Dictates - actions may take several weeks depending on resolution actions for EB.	Executive updates as and when required: by phone and follow up email
Stage 5 - Closure	CM/PRM to present resolved case details for closure at internal final review meeting with CEO	CM/PRM/ CEO		Formal case closure letter to EB Executive and board

Case Type	Description
No Breach	When no breach was identified after a case is opened and the matter should be closed
A	Minor or simple case, no financial element
B	Case with medium complexity, no immediate risk of further breaches
C	Complex case, or case with immediate risk of further breaches

Acronym	Description
CEO	Chief Executive
CM	Compliance Manager
PRM	Policy and Regulations Manager
RO	Responsible Officer
EB	Environmental Body

BREACH MANAGEMENT FRAMEWORK – POSSIBLE ACTIONS FOR EACH CASE

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If resolution is not achieved – refer to Entrust board for the following:

