

INCIDENT MANAGEMENT PROCESS

11 Steps

This is as an **iterative** process, particularly in situations where new information is produced or the situation escalates or deteriorates.

Any public disclosure by the LBMA must be approved appropriately and disseminated through correct channels.

This procedure is invoked in response to a particular stimulus of a reputational nature; this includes any incident that affects the credibility of the GDL

If at any point in the procedure it is established that the issue could relate to Anti-Money Laundering (AML), step **6) Refiner Contact** may be omitted and the relevant specific action taken.

1. Receipt /Logging of Complaint /Issue

2. Media and Market Review

3. RGG Audit (or equivalent) Review

4. Auditor Review and Interaction

5. Legal Review

6. Refiner Contact

7. Physical Committee Reporting and Escalation and/or Legal Consultation

8. Action/Sanction

9. Public Disclosure

10. Lessons Learnt

11. LBMA Communication