MAS CONSEQUENCE MANAGEMENT FRAMEWORK

- **What is the MAS Consequence Management Framework?**
  The MAS Consequence Management Framework is a **GUIDELINE** for the organization, to be referred to, when managing non-compliance of the MAS values, Code of Conduct and Policies.

- **Why do we need a Consequence Management Framework?**
  The Consequence Management Framework would ensure the decisions made in addressing non-compliance are fair, objective, transparent, justifiable and consistent across board.

- **How do we use the Consequence Management Framework?**
  Once a concern is raised, the preliminary investigation team will follow the standard investigation process. The framework would be used at the point when a decision for the proven act of non-compliance has to be made. The framework consists of a 'Consequence Management Grid' which specifies the risk based on 'Level of Impact' and 'Level of Intention', and a 'Consequence-Process Table' which specifies the action to be taken and process to be followed, for each level of risk. Follow the below steps in arriving at the decision;

REFER MAS CONSEQUENCE GRID

1. Look at the 6 areas of impact specified in the 'Impact Description', within each quadrant (Financial, Service Delivery, etc.). Identify which area/s is affected by the act of noncompliance. One or multiple areas could be affected.
2. Identify the Level of Impact; Severe, major, moderate or minor. If several areas are impacted at varying levels, **the area with the highest Level of Impact will be the deciding factor** in determining the over-all Level of Impact. Eg: If the financial impact is severe and environmental impact is moderate, the over-all Level of Impact will be **severe.**
3. Identify the 'Level of Intention'; Honest mistake, careless, repeat offence or intentional.
4. Identify risk level; Extreme, high, medium or low.

REFER MAS CONSEQUENCE-PROCESS TABLE

1. Understand consequences / action to be taken for each category of risk.
2. Identify and follow due process in strengthening The MAS DNA and its related policies and procedures.

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MAS CONSEQUENCE MANAGEMENT GRID

	Impact Description	Level of Intention			
		Honest Mistake	**Careless**	**Repeat Offence**	**Intentional**
		Unaware, not trained, unintentional	**Aware but did not follow due process / lack of understanding**	**Repeatedly makes the same mistake with no respect for the process**	**Tries to override process/elude control, hurt/harm, or enjoy personal gain**
Severe	• **Financial** – Long term impact on MAS or divisional level finances. Losses not recoverable beyond the next financial budget, thereby jeopardizing critical business functionality. • **Service Delivery** – Disruption to multiple critical deliverables. Causes serious and prolonged problems for customers and stakeholders. This could include manipulations/violations that amount to fraud or illegal activity. • **Reputation** – Affects MAS's long-term credibility with customers and stakeholders. Loss of public trust. Severe consequences that may incur prolonged public scrutiny and media attention. This could include a direct conflict of interest which was not disclosed or disclosed, and protocol has not been followed. • **People** – Behavior and conduct that negatively affects an individual, a group of individuals, or a team's mental health and performance or physical safety. This may include physical violence or severe verbal abuse, any form of sexual harassment, sexual bribery, intimidation threats or retaliation. Such behavior may be repeated or not and is considered a serious offence. • **Health and safety** – Reduced workforce capability/capacity, threatening long term service delivery. Death or permanent disablement. • **Environmental –** Permanent damage to the environment.	**Medium**	**High**	**Extreme**	**Extreme**
Major	• **Financial** – Medium term impact on MAS or divisional level finances. Losses not recoverable within the current financial budget. • **Service Delivery** – Disruption to a critical deliverable. Threaten the completion of a strategic program/project and business case benefits. Causes problems for customers and stakeholders in fulfilling their obligations. This could include manipulation of records/ violating processes that could lead to fraud. • **Reputation** – Have a detrimental effect on the divisional short-term credibility with customers and stakeholders. Short term public scrutiny / media attention. This could include a situation of potential conflict of interest which was undisclosed. • **People** – Behavior and conduct that negatively affects an individual, a group of individuals, or a team's mental health and performance. This may include threats or fear of violence, harsh language, inappropriate or unprofessional comments, any comments of a sexual nature, and other intentional acts. Such behavior may be repeated or not and is considered a serious offence (intentional in nature – can be a repeat offence). • **Health and safety** – Serious injury or work caused illness. • **Environmenta**l – Long term detrimental impact on the environment.	**Medium**	**High**	**High**	**Extreme**
Moderate	• **Financial** – Short term impact on SBU finances. Losses recoverable within the current financial budget. • **Service Delivery** – Interruption to SBU level essential performance targets. Threatens the realization of project benefits. • **Reputation** – Cause customer and/or stakeholder dissatisfaction and has a negative effect on the SBU's credibility and stakeholder relations. Incur significant review or change of manner of delivery. • **People** – Behavior and conduct that negatively affects a group of individuals or a team's mental health and performance (Unintentional in nature). • **Health and safety –** Reduced workforce capability/capacity affects service quality. Injury/illness requires medical treatment. • **Environmental –**Short term impact on the environment; able to be contained with specialist assistance.	**Low**	**Medium**	**High**	**High**
Minor	• **Financial** – Minimal impact on departmental finances. Losses recoverable within the current financial budget. It would have some minor financial implications requiring a review of internal financial controls. • **Service Delivery** – Minor interruption to service/s and associated service performance targets. It would be detrimental for some aspects of a program or project. • **Reputation** – It would cause some customer or stakeholder complaints requiring additional management. • **People** – Behavior and conduct that negatively affects an individual's mental health and well-being (unintentional in nature and exclude any behavior that could amount to sexual harassment). • **Health and safety –** Reduced workforce capability/capacity affects operational processes. Localized first aid required. • **Environmental –** Minimal impact on the environment.	**Low**	**Low**	**Medium**	**Medium**

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CONSEQUENCE – PROCESS TABLE

Risk Rating	Consequence / Action	Process
Extreme	• Immediate suspension of employment (with pay). • Show-cause letter and internal inquiry (in consultation with EFC). • **Immediate separation leading to termination** of employment (Employee placed on exit track) • **Legal action** as appropriate depending on the facts and circumstances, in consultation with EFC.	• The SBU Code Officer / DNA Champ shall prepare a detailed report and send it to HOD following the preliminary fact-finding. • The standard investigation process should be followed, and an independent consultant's opinion should be obtained through a domestic inquiry, where relevant. • All decisions shall involve Divisional CODE Officers and DNA lead for the division. The relevant EXCO members must also be updated. • All Divisional Level Code Officers must be made aware to establish or strengthen risk control and mitigation. • Once the necessary outcome is determined, a copy of the report will be placed in the personnel file of the employee concerned, and another will be uploaded to the NAVEX platform. The Line Manager and HOD shall be informed of the case outcome. • Once the case is closed the Apparel Board and Divisional EXCO shall be informed in accordance with the established guidelines.
High	• Show-cause letter and internal inquiry (in consultation with EFC). • Concerned employees may need to be **transferred** or separated from the organization. Any separation agreement should be signed off by the Head of Division. • In the event that the employee is to remain employed, he/she shall **not be considered for promotions** for a minimum of 2 years. **Variable pay will be withheld** for this period. • Any other **discretionary payment** such as increments and bonuses may be **withheld** for an agreed upon period. • **Discontinuation of Company-Provided Benefits** (Flexi work arrangements) • **Self-paced training** (If it is a MAS Value or MAS DNA Policy violation, mandatory self-paced training will be provided to the employee in question.) • **Development plan** will be determined and developed by HR and HOD. • **A mentor** will be appointed for an agreed-upon period (6 to 9 months). If it is a behavioral issue, the mentor should be assigned by HR, and a formal sign-off from the mentor can be obtained by the DNA (Discipline & Accountability) team.	• The SBU Code Officer / DNA Champs shall prepare a detailed report and send it to HOD following the preliminary fact-finding. • Report to Head of Division and EXCO via Divisional Code Officer. • Internal controls established where lacking and strengthened where weak. • Progress plan implemented by Divisional Code Officer and progress reported to Divisional Head and EXCO members. • Behavior-related issues shall be monitored by the Line Manager and Human Resources, with progress to be reported to the Head of Department and the relevant EXCO members. • Refresher training conducted and internal control strengthened. SBU Code Officer to report progress. • Once the necessary outcome is determined, a copy of the report will be placed in the personnel file of the employee concerned, and another will be uploaded to the NAVEX platform. The Line Manager and HOD shall be informed of the case outcome. • Once the case is closed the Apparel Board and Divisional EXCO shall be informed in accordance with the established guidelines.
Medium	• Show-cause letter and internal inquiry. • **Written warning** (To be placed in employee's personal file) • A maximum of **20% of variable pay** may be withheld. • Any other **discretionary payment** such as increments and bonuses may be withheld for an agreed upon period**.** • **Discontinuation of Company-Provided Benefits** (Flexi work arrangements) • **Self-paced training** (If it is a MAS Value or MAS DNA Policy violation, mandatory self-paced training will be provided to the employee in question.) • **Development plan** will be determined and developed by HR and HOD. • **A mentor** will be appointed for an agreed-upon period (6 to 9 months). If it is a behavioral issue, the mentor should be assigned by HR, and a formal sign-off from the mentor can be obtained by the DNA (Discipline & Accountability) team.	• The SBU Code Officer/DNA Champ shall prepare a detailed report and send it to the HOD following the preliminary fact-finding. • The SBU Code Officer, Divisional HR, to discuss the matter with the HOD and GM/EXCO members. • Refresher training conducted and internal control strengthened. SBU Code Officer to report progress. • Progress reported regularly to HOD and GM/EXCO. • Once the necessary outcome is determined, a copy of the report will be placed in the personnel file of the employee concerned, and another will be uploaded to the NAVEX platform. The Line Manager and HOD shall be informed of the case outcome.

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Low	• **Verbal Warning** - This shall be followed by an email summarizing the conversation. For TM a note is to be placed in their personal file stating that a verbal warning has been issued, along with a summary of the issue (This does not constitute a written warning) • **Cautionary Letter** • **Self-paced training** (If it is a MAS Value or MAS DNA Policy violation, mandatory self-paced training will be provided to the employee in question.) • **A mentor** will be appointed for an agreed-upon period (6 to 9 months). If it is a behavioral issue, the mentor should be assigned by HR, and a formal sign-off from the mentor can be obtained by the DNA (Discipline & Accountability) team.	• The SBU Code Officer/DNA Champ shall prepare a detailed report and send it to the HOD following the preliminary fact-finding. • The Line Manager will take all necessary steps to train the employee on the relevant policy and process to avoid recurrence (Mediation and counselling or mentoring are some tools that can be used). • The employee's behavior shall be monitored, and necessary training shall be provided, especially in cases classified as low or medium severity. • Once the necessary outcome is determined, a copy of the report will be placed in the personnel file of the employee concerned, and another will be uploaded to the NAVEX platform. The Line Manager and HOD shall be informed of the case outcome.

*The MAS Consequence Management Framework is only a **guideline** for decision-making. Each act of non-compliance will be dealt with, on a case by case basis, depending on the facts and circumstances of each case.

Please contact the DNA Centre of Expertise on +94114796485 if you need any clarifications on the framework.

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