Policy Framework

Governance Framework | Global

Version 2.0 · July 2026 · Confidential — Internal Use

This document is a template intended to be reviewed, tailored and approved by your organisation before use.
Replace all references to “the Company” with your organisation’s name.

Document Control

Document name	Policy Framework
Document type	Governance Framework
Jurisdiction	Global
Owner	Company Secretary
Approved by	Board of Directors
Version	2.0
Effective date	July 2026
Review cycle	Annual
Next review due	July 2027
Classification	Confidential — Internal Use

Contents

1. Purpose

This Framework is the Company's policy on policies. It establishes a single, consistent architecture for all governance documents — Board policies, frameworks, strategies, management standards, procedures and guidelines — and prescribes how those documents are created, structured, consulted on, approved, published, reviewed, exempted from, enforced and retired.

Its objectives are to ensure that: every requirement imposed on staff has a clear, current and authorised source; approval authority is exercised at the tier appropriate to the risk and significance of the document; documents are accessible to the people who must comply with them; and the total body of documents remains coherent, non-duplicative and aligned with the Company's strategy, risk appetite and legal and regulatory obligations.

A disciplined document hierarchy is itself a control. The BCBS Corporate Governance Principles for Banks and the G20/OECD Principles of Corporate Governance (2023) both hold the board responsible for the framework of policies and internal controls through which the institution is directed; poorly maintained policies create compliance gaps, contradictory instructions and unclear accountability. This Framework therefore treats the governance document set as a managed asset with a named custodian, a central register, defined review cycles and consequences for breach.

This Framework is approved by the Board of Directors. The Company Secretary owns it and is Custodian of the document management arrangements it establishes.

2. Scope

This Framework applies to the Company and all of its controlled entities, and to every governance document issued in their name. It binds all directors, employees, secondees, contractors and consultants who draft, approve, publish, rely on or must comply with governance documents, across all business units, products and channels.

It covers the full lifecycle of a governance document: identification of need, drafting, consultation, approval, publication, training and attestation, periodic review, amendment, exemption and retirement.

The following are outside scope and are governed by their own control regimes: contracts and other legal agreements; board and committee papers and minutes; marketing and customer-facing disclosure material; project documentation; and transactional business records. The Board Charter, committee charters and the Company's constitutional documents sit above this Framework; where they conflict with it, they prevail.

Where a controlled entity is subject to additional local regulatory requirements, it may supplement — but must not weaken — the requirements of this Framework, with the prior written agreement of the Company Secretary.

Jurisdictional application. This Framework states international best practice drawn from the standards listed in section 4. The Company must map its requirements to the law and regulation of each jurisdiction in which it operates, and must document that mapping for each governance document that implements a local legal obligation. Where the law of an operating jurisdiction imposes a stricter or additional requirement, local law prevails and the affected documents must be updated accordingly.

3. Definitions

Term	Definition
Governance Document	Any document within the hierarchy established by this Framework, comprising Board policies, frameworks, strategies, management standards, procedures and guidelines.
Board Policy	A Tier 1 document approved by the Board — including a policy, framework, strategy, plan, charter or standard — that states binding principles and requirements on matters of strategic, prudential or whole-of-Company significance, or that the Board is required to approve under applicable law, regulatory requirements or the Company's governance framework.
Framework	A Tier 2 document that describes the architecture of an area of activity, comprising its components, how those components interact, and the documents and processes that give effect to it.
Strategy	A Tier 2 document that sets out the Company's forward-looking approach to managing a defined area, including objectives, priorities and resourcing, over a stated horizon.
Management Standard	A Tier 3 document approved by the CEO or an Accountable Executive that translates a policy or framework into binding operational requirements for a business area.
Procedure	A Tier 3 document setting out the mandatory sequential steps by which staff perform a task required by a policy, framework or standard.
Guideline	A Tier 4 document providing non-binding guidance, better practice or explanatory material supporting a higher-tier document. Guidelines cannot impose requirements.

Document Owner	The executive or senior manager accountable for the content, currency, implementation and review of a governance document.
Approval Authority	The body or role authorised under this Framework to approve a new governance document, a material amendment, an exemption from it, or its retirement.
Custodian	The Company Secretary, who administers this Framework, maintains the Policy Register and controls the document templates and publication channels.
Material Amendment	A change that alters the requirements, scope, risk position, accountabilities or intent of a document, or that affects the rights or obligations of any person.
Minor Amendment	A change limited to typographical, formatting, naming, hyperlink or referencing corrections, or updates to position titles, that does not alter any requirement or obligation.
Policy Register	The central register of all governance documents maintained by the Company Secretary, recording for each document the metadata prescribed in section 12.
Attestation	A formal written confirmation by an accountable individual or staff member that, to the best of their knowledge after due enquiry, stated obligations, controls or requirements have been met for their area of responsibility during the relevant period, or that a document has been read and understood or remains current, together with disclosure of any known exceptions.
Exemption	A time-limited, formally approved waiver from compliance with a specific requirement of a governance document, granted under section 11.
Accountable Executive	A director or member of senior management to whom the Board or Chief Executive Officer has assigned named, documented individual accountability for a business line, function or material risk class of the Company, including any person registered, certified or designated under the senior manager accountability regime applicable in the Company's jurisdiction(s).

4. Regulatory Framework

The key legislation, regulations and standards relevant to this document include (as amended from time to time):

Instrument / Standard	Relevance
BCBS Corporate Governance Principles for Banks	Places responsibility on the board for approving and overseeing the bank's governance framework, policies and internal controls; this Framework operationalises that responsibility through a controlled document architecture.
G20/OECD Principles of Corporate Governance (2023)	Requires boards to guide and review corporate policy, ensure the integrity of internal control systems and oversee disclosure; the approval, review and reporting machinery in this Framework gives effect to those expectations.
Basel Core Principles for Effective Banking Supervision (2024 revision)	Supervisors expect banks to maintain documented, board-overseen policies and processes commensurate with their risk profile; this Framework ensures those documents exist, are current and are demonstrably controlled.
Basel Framework (BCBS)	Numerous Basel standards require specific board-approved policies (for example on risk management, capital, liquidity and outsourcing); this Framework prescribes how such documents are drafted, approved, reviewed and evidenced.
ISO 37301:2021 Compliance Management Systems	Its requirements for documented information, defined obligations, policy lifecycle control and management review are reflected in the drafting, register and review provisions of this Framework.
COSO Internal Control — Integrated Framework	Treats policies and procedures as control activities within the control environment; this Framework ensures those controls have named owners, current content and audit trails.
ISO 31000:2018 Risk Management	Positions documented policy and accountability arrangements as part of the risk management framework; the tiering and alignment principles in this Framework support that integration.
IIA Global Internal Audit Standards (2024)	Governs the third-line assurance that Internal Audit provides over governance processes, including the operation of this Framework and the accuracy of the Policy Register.

End of preview

This is a preview extract. The complete document continues beyond the pages shown here.

The full document is supplied as a single, fully editable Microsoft Word (.docx) file immediately after purchase — including every remaining section, the definitions, the regulatory framework references and all appendices and templates.

Bracketed prompts such as [30 days] mark the points where your own thresholds, committee names and local regulatory references are inserted.

finance-policies.com