

THE BARCLAYS PLAN

| | Already undertaken/ being prepared | Phase I June - August 2018 | Phase II August - September 2018 | Phase III October 2018 onwards |
|-----------|---|--|---|---|
| Training | Refresher training Log of training recipients | One-off refresher training delivered to relevant staff | Enhanced training and scenario-based assessment for existing and new relevant staff as required | Annual enhanced training and scenario-based assessment for existing relevant staff and for new staff Training to be updated as required. Notify CMA of any issues and actions identified from the review of training |
| Controls | Developments of requirements for automated escalation control and procedures Manual monthly validation | Development of automated escalation control Manual monthly validation | Automated escalation control live Manual monthly validation | Automated and manual processes to run in parallel for a limited period |
| Assurance | Review by Barclays UK Compliance Monitoring & Testing team to test compliance with the Order and escalation process | Completion of review by Barclays UK Compliance Monitoring & Testing team | Preparation of assurance of operational effectiveness of enhanced controls | Review of enhanced controls Annual validation of compliance with Barclays Plan, effectiveness of the training and number of staff trained |