

# RESPONSIBLE BUSINESS POLICY

Approved by the Board Risk Committee on **3 December 2014**

## **Group Operating Manual**

All Policies and Standards must be read in conjunction with the Group Operating Manual and Quick Reference Guide.

## **Policy Waiver Process**

The normal policy and Standards waiver process as set out in the Group Operating Manual will apply for any BU or Sub-Business Unit which can demonstrate a justification for any specific additional transition arrangements.

## **Adoption and Implementation**

This standard is effective from **15 December 2014** and must be adopted at Business Unit Board level three months after this date, with a further three months to implement in the sub-Business Units.

# 1 Overview

## 1.1 Purpose

This Responsible Business (RB) Policy is designed to mitigate social, environmental and ethical risks that may prevent the Old Mutual Group from meeting its business objectives. These risks could materialise as a result of weak internal processes, ineffective performance management and reward processes, or ineffective assessment of the legal, ethical, commercial or other expectations stakeholder and society have for business. The policy is also designed to orientate the business towards sustainability opportunities that would support the Old Mutual Group meeting its business objectives. The principles and standards in this policy support the Group alignment and membership to external RB guidelines such as the United Nations Global Compact, the United Nations backed Principles for Responsible Investment, the OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises and the International Labour Organisation Labour Standards alongside listings on the FTSE4Good Index and the JSE's Socially Responsible Investment (SRI) Index.

The Responsible Business Policy is anchored on the following five key pillars which are described in greater detail in sections 4.4 to 4.9 below:

- Responsible to our customers
- Responsible investment
- Responsible to our employees
- Responsible to our communities
- Responsible environmental management

This document sets out the approach, principles and mandatory minimum standards for the management of RB across the Old Mutual Group. The risk associated with RB management is a sub-risk of both Operational Risk and Strategic Risk – Level 1 Risks as set out in the Risk Categorisation Model.

The Enterprise Risk Management Policy sets out the principles and standards for the management of all Level 1 Risks as set out in the Enterprise Risk Categorisation Model. This document sets out the RB-specific principles and standards which are deemed necessary to control or mitigate the Level 2 and Level 3 related risks. It is expected that the RB processes to support these principles and standards are set out in local process documentation.

This Policy must be read with the Enterprise Risk Management Policy and the Enterprise Risk Management Definitions. Defined terms have upper case first letters, for example Responsible Business, Policy etc.

## 1.2 Applicability

This policy is applicable to all Business Units (BU) of the Group as defined in section 10 of the Group Operating Manual (GOM). In respect of any BUs, or any sub-business units or other entities within a BU, which are not under the 100% control of the Old Mutual Group, the Old Mutual shareholder (or equivalent) should exercise its rights to ensure that, so far as practicable, the principles and standards contained within this Policy are complied with. Where that is not practicable, the spirit and intent of this policy should be followed to the greatest extent possible. No BU is out of scope of this policy.

## 1.3 Scope

**In Scope:** This Policy applies directly to all individuals permanently employed by the Old Mutual Group. The spirit and intent of this Policy should be considered to the greatest extent possible for individuals engaged by any company within the Old Mutual Group on a temporary or contract basis.

**Out of Scope:** None.



## 2 How Responsible Business risks arise

Responsible Business risks arise from numerous aspects including:

- 2.1 Reputational risk - Reputational risk is the possible loss of the organisation's reputational capital. It can also be defined as the risk of a negative impact that results from the deterioration of Old Mutual's reputation among stakeholders. These potential impacts include revenue loss, reduced customer and employee loyalty, litigation, regulatory sanction or additional oversight, and declines in Old Mutual's share price.
- 2.2 Strategic risk – that the pursuit of commercial success in ways that are not ethical and / or do not respect people, wider society and the natural environment may result in financial loss through damages or criminal prosecution and damage to the reputation of the Group.
- 2.3 Business/investment risk – the risk that business profitability is negatively impacted as a result of not appropriately incorporating material long-term environmental, social and governance risks into products and the associated investment decision making processes.
- 2.4 Legal risk – prosecution of the Group or its Employees for unethical behaviour or not meeting national legislative requirements.
- 2.5 Regulatory risk – loss of regulator and Responsible Business organisations' confidence and trust which could impact on shareholder and customer confidence and investments in Old Mutual. Including Breach or regulatory sanction from non-compliance with the requirements of the Solvency II Directive.
- 2.6 Operational risk – fines, legal costs and/or costs of remedial action as a result of a supplier action, including losses caused by undisclosed or unmanaged conflicts of interest.
- 2.7 External validation risk – the Group could fail to meet the criteria for inclusion in the FTSE4Good Index and the JSE Socially Responsible Investment Index listings or need to restate data and our rating in such listings could be reduced or withdrawn.
- 2.8 Social and Environmental Risk – the Group could fail to integrate cultural, social and environmental sustainability into its business model. Directly failing to consider and reduce the impact of our operation. Indirectly causing damage to society and the environment through investment activities that cause harm to society or the environment.
- 2.9 Employee risk – please refer to People risks as set out in Section 2 of the Group HR Risk Policy.

## 3 Risk Appetite

The Group has no appetite for not treating any of its stakeholders fairly, honestly and reasonably. As such, all material decisions should explicitly consider the impact on all the Group's stakeholders / pillars of responsible business. Clear information should be available to identify any conflicts / trade-offs between the needs of different stakeholders, and approvals / prior clearances as per this policy should be followed. Where there is uncertainty, individuals should err on the side of caution and consult with the Group Responsible Business Team.

Where material breaches are identified, the Group has no appetite for not escalating and rectifying it in a timely manner.

The Group has no appetite for any employee not being aware of their responsibilities in relation to Responsible Business, and all endeavours should be made to ensure that individuals are aware of their responsibilities aligned to the Code of Business Conduct and the Responsible Business Policy.



## **4 Responsible Business Management Principles & Standards**

### **4.1 Application of Policy**

- 4.1.1 No modification of these core Principles and Standards will be permitted without a formal waiver granted by the Group Head of Responsible Business. If the waiver is not granted then a remedial action plan to achieve compliance must be agreed with the Head of Responsible Business.
- 4.1.2 Each Business will be asked to confirm via a bi-annual Letter of Representation that they are compliant with each of the terms of this Policy. If a Business Unit cannot confirm compliance, the reasons for this, and a description of the remediation actions required, must be stated in the Letter of Representation.
- 4.1.3 It must be made clear to every individual in scope that they have a responsibility to act within and respect the Responsible Business Principles and Standards as set out in this Policy and the Code of Business Conduct.
- 4.1.4 This Policy sets out the Principles and Standards expected but allows each Business Unit to determine how best to achieve these. Local practices and processes should be documented and be available for review.
- 4.1.5 Group clearance requirements are in addition to any clearance or notification obligations that apply at Business Unit level and unless otherwise indicated, must be obtained or given prior to the Business Unit's formal commitment to the matter or transaction in question.

### **4.2 Statutory, Regulatory and Group Requirements**

- 4.2.1 The requirements set out in this Policy are minimum requirements. Local statutory or regulatory requirements must prevail where such requirements are more rigorous than these minimum requirements.
- 4.2.2 Details of action plans, targets and progress should be reported to the Business Unit Executive Committee and the Group Responsible Business Committee.

### **4.3 Authorisation of Responsible Business-related Decisions**

- 4.3.1 Decisions relating to capital investments in properties occupied by our employees to reduce environmental costs, capital investments related to community or corporate social investments or other material RB-related matters must be taken into account by the relevant Business Unit Committee. Where appropriate in consultation with the Group Responsible Business Committee.
- 4.3.2 Where applicable the principles and processes of dual reporting as set out in the Group Operating Manual must be adopted and adherence monitored to ensure compliance.

### **4.4 Responsible to our customers**

- 4.4.1 This section does not take away the need for Business Units to comply with their own customer related policies and treating customer fairly programmes depending on the legal and regulatory environment in those countries.

- 4.4.2 Business units must report, to the Group RB team, the group-agreed KPIs for the Responsible Business Report and other public disclosures.
- 4.4.3 Business Units must regularly facilitate and listen to customer feedback and take account of it. Customer feedback should be recorded and used as part of the Group's approach to Stakeholder Engagement (which will contribute to communication of and approach to Responsible Business).
- 4.4.4 Customers must be dealt with in a way that is open, honest and fair.
- 4.4.5 Employees whose role requires advice to be given must give the appropriate advice, to grow customers' assets in a way that meets customer needs. Business Units must comply with Fit & Proper Standard to ensure employees are fit and proper to conduct their roles and meet customer needs.
- 4.4.6 The selling and promotion of the Group's financial products must be done in a way that is clear and transparent for the relevant level of investor.
- 4.4.7 Clear information must be provided to customers about how their funds are invested in a regular and timely manner.
- 4.4.8 Any errors (that are identified by businesses within the Group and are within its control) that affect customers must be rectified as quickly as possible.

## **4.5 Responsible investment**

- 4.5.1 The Group approach to Responsible Investment as set out in the Group Responsible Investment Standard must be actively applied.
- 4.5.2 Material environmental, social and governance (ESG) risk and opportunities will be properly recognised, evaluated and where appropriate incorporated into investment and ownership decision making processes.
- 4.5.3 ESG risk will be considered as part of the development and provision of new products and services. Where a Business Unit is responsible for services and products other than investment purposes, ESG-related principles are to be considered i.e. Principles for Sustainable Insurance, Equator Principles and other industry recognised principles.
- 4.5.4 Business Units will act as responsible owners and stewards of assets on behalf of our customers and shareholders and incorporate ESG issues into ownership policies and practices. This includes but is not limited to:
  - Voting proxies for listed equity and disclosing vote results in a manner consistent with the business Units responsible owners guidelines and or policies.
  - Business Units will seek appropriate disclosure on material ESG risks and opportunities from the entities in which we invest and where material, engage with the management of such entities on material issues.
- 4.5.5 Business Units must meet annual disclosure requirements including but not limited to:
  - Submission of a progress report in their local market on implementation of the Group Responsible Investment Standard.
  - Submission of Responsible Investment KPIs for the annual Responsible Business Report
  - Submission of a responsible investment data for use by the Group Responsible Investment Committee and for the Group report on progress towards application of the United Nations-supported Principles for Responsible Investment (UN PRI).
- 4.5.6 Business Units will ensure that appropriate procedures are designed and implemented to meet the requirements of the Group Responsible Investment Standard.



- 4.5.7 Business Units will liaise with the Group Responsible Investment Committee when adopting new Investment and / or Ownership policies and criteria.
- 4.5.8 Business Units will seek opportunities to collaborate and share best practice across the Group with regards to Responsible Investment practises.

#### **4.6 Responsible to our employees**

- 4.6.1 The HR Principles and Standards set out in the Group's HR Risk Management Policy and Code of Conduct must be actively promoted. All decisions and actions must be in line with those minimum standards.
- 4.6.2 All Employees and prospective Employees must be treated and treat each other with dignity and respect at all times, as included in the Group HR Risk Management Policy.
- 4.6.3 An environment must be developed and maintained within which the benefits of equal opportunity and a diverse workforce are promoted.
- 4.6.4 Business Units must report the group-agreed Employee KPIs to the Group HR team for the Responsible Business Report, UN Global Compact and other public disclosures.

#### **4.7 Responsible to our communities**

- 4.7.1 Community Investment activity is to be aligned to the Group's Responsible Business Community Investment Principles focusing in the main on education, primarily financial education, skills and enterprise development, and local community growth.
- 4.7.2 Business Units must demonstrate support for community activity by actively promoting initiatives and encouraging Employee participation (through volunteering, support for fundraising and Employee awareness campaigns) where appropriate.
- 4.7.3 Business Units must share their planned community investment activities or annual plans with the Group Head of Responsible Business with the aim of maximising synergies across the Group. Where able, collaborative Business Unit community investment activities should be factored into planning.
- 4.7.4 Community investment KPIs must be reported via the Group Non-Financial Reporting system (Credit360) on a quarterly basis and content must be provided for the annual Responsible Business Report and other communications. Donations and other cash gifts are to be reported from all budgets in the Business Unit not just the Foundation activity (where applicable).
- 4.7.5 The five Old Mutual Foundations, along with the community investment specialists in the Business Units are to work together to leverage skills and resources and maximise brand impact, co-ordinated by the Head of Responsible Business.

#### **4.8 Responsible environmental management**

- 4.8.1 Each Business Unit must set local targets aligned to the Group environmental targets, establish action plans and measure their use of energy, water, waste consumption and other KPIs as agreed for each of their locations occupied by employees and property portfolio. This is to aid the Group with reducing its carbon footprint and other material environmental impacts.
- 4.8.2 Employee awareness and engagement campaigns must be provided to aid Employees in understanding their environmental impacts and their role in minimising these for the Group.



4.8.3 Environmental KPIs must be reported via the Group Non-Financial Reporting system (Credit360) on a quarterly basis and content must be provided for the annual Responsible Business Report and other communications.

4.8.4 Business Units will pursue commercial opportunities which help facilitate a low carbon economy across the Old Mutual Group and will work with responsible investment and responsible business teams to identify and develop relevant opportunities in this space, this includes the sourcing of renewable energy for office buildings or on-site energy generation opportunities where feasible.

## 4.9 Responsible procurement

At Old Mutual, we recognise that our suppliers are integral to us delivering our vision of being our customers' most trusted partner. Responsible Business plays an important part in how we engage with our suppliers through to help build meaningful business relationships, realise efficiencies and contribute to sustained growth for other sectors.

4.9.1 Business Units must observe lawful, efficient and fair practices when dealing with suppliers or service providers. This includes not using their respective positions within Old Mutual for personal gain, exert improper influence over and offer, pay, solicit or accept bribes in any form from suppliers or service providers. Integrity in dealings with suppliers or service providers is a prerequisite for successful long-term business relationships and in order that any possible corporate governance related risk is minimised.

4.9.2 In communications with suppliers, untruths, concealment and overstatement must be avoided. Business Units must not deliberately give inadequate or misleading information, specifications or requirements. In accepting business or entering contracts, employees must observe the highest standards of integrity and act in the very best interests of Old Mutual. Business may not be placed or accepted, or contracts or arrangements entered into, for any improper motive.

4.9.3 Old Mutual requires its preferred and appointed suppliers to ensure that responsible business considerations form an integral part of their daily business activities throughout its supply chain. Furthermore, in the provision of goods and rendering of services to Old Mutual, appointed suppliers must provide goods and services in a manner in which negative impact is reduced. Business units are encouraged to work with suppliers who have not developed responsible business programmes for themselves to support them, sharing our experiences, to help introduce appropriate processes within our supply chain, including leveraging working practices already being used across Old Mutual.

## 4.10 Governance and Ethics

The Policies and Principles contained within the Group Operating Manual must be adhered to and actively promoted to ensure appropriate ethical standards. This includes, but is not limited to, the:

- Code of Business Conduct
- Core Values of the Group
- Group Financial Crime Prevention Policy
- Group Conflicts of Interest Policy
- Group Anti-Bribery and Corruption Policy
- Group Human Resources Risk Management Policy

## 4.11 Responsible Business Roles

Business Units are responsible for assigning the following roles:

- ExCo individual/s accountable for the performance of Responsible Business in their Business Unit. This person/s is accountable for all information shared with Group Head of Responsible Business, Group



Responsible Business Committee and related Committees and ultimately the Group Executive Committee.

- Information, particularly KPI data, shared with the above individuals and Committees must be considered robust and accurate enough to publically disclose.
- The ExCo individual will be expected to attend the Group Responsible Business Committee to represent their Business Unit when necessary.
- Policy Owner is responsible for reporting the Business Unit compliance to the Responsible Business Policy as part of the Letter of Representation process.
- Practitioner/s responsible for the day-to-day delivery of Responsible Business activity in the Business Unit, in partnership with the Group Head of Responsible Business and other peers in the Group.

## 4.12 Responsible Business Reporting

Business units must:

- 4.12.1 Allocate a Business Unit Representative (or the above mentioned practitioner) to provide quarter-end status (through but not solely based on Credit360) on Responsible Business KPI data and activity as defined by the Group Head of Responsible Business. All information to be signed-off by the ExCo member or Policy owner responsible for Responsible Business.
- 4.12.2 Ensure that the appropriate Business Unit Representative to attend quarter-end group-wide status calls/meetings on Responsible Business KPI data and activity.
- 4.12.3 Provide directly to the Group Head of Responsible Business (and record via the Business Unit risk reporting and escalation processes) all material Responsible Business issues which have arisen and any material Responsible Business risk events.
- 4.12.4 Notify the Group Head of Responsible Business of any material breach or near miss associated with this Policy.

## 5 Breaches of the Policy

Business units must have processes in place to enable the identification, recording, reporting and rectification on a timely basis of:

- Breaches of this policy.
- Non-compliance with any relevant requirements and/or standards.
- Risk control failures, issues and other shortcomings.

## 6 Assessment of Responsible Business Related Risks

- 6.1 In terms of the three lines of Defence Model, Business Unit line management are responsible for assessing/measuring Responsible Business Risk.
- 6.2 As a minimum, Responsible Business Risk must be re-assessed on an annual basis, however should additional information become available that is directly linked to the risk or its controls, a re-assessment of the risk must be conducted immediately.
- 6.3 Early warnings must be provided in accordance with the risk escalation reporting process set out in the Group Escalation Process.
- 6.4 Escalation will be via the Business Unit ExCo Member accountable for Responsible Business to the Group Head of Responsible Business. In the case of a Solvency II breach escalation will be through the Group escalation standards.



## Appendix A - Definitions

Term	Definition
Responsible Business	<p>For Old Mutual, Responsible Business is the pursuit of commercial success in ways that respect ethical values, people, wider society and the natural environment. This is achieved by addressing the legal, moral, commercial and other expectations placed on international businesses.</p> <p>Activities included in Responsible Business can include philanthropy, corporate social investment, community investment, environmental management, responsible investment.</p> <p>Old Mutual has identified the following key issues addressed through our approach to Responsible Business:</p> <ol style="list-style-type: none"> <li>1. Responsible to our customers</li> <li>2. Responsible investment</li> <li>3. Responsible to our employees</li> <li>4. Responsible to our communities</li> <li>5. Responsible environmental management</li> </ol>
Responsible investment	<p>Responsible investment is an investment strategy which seeks to generate both financial and sustainable value. It consists of a set of investment approaches that integrate environmental, social and governance (ESG) and ethical issues into financial analysis and decision-making.</p>
ESG	<p>Environment, Social and Governance criteria – applied to investment ownership or management decisions to understand and help monitor the environmental, social and / or governance / ethical impacts of said investment.</p>
Community Investment	<p>Community investment (CI) refers to a company's long-term strategic involvement in community partnerships to address social issues chosen by the company.</p> <p>CI comprises of the following components:</p> <ul style="list-style-type: none"> <li>• Financial contributions</li> <li>• In-kind donations of both goods and services, including the loan of assets such as company premises or resources</li> <li>• Contributions of time and skills, known as Employee Volunteering or EV</li> </ul>
Environmental Management	<p>Environmental management is a systematic approach to minimising the damage created by an organisation to the environment in which it operates.</p>

## Appendix A – Responsible Investment Standard

# RESPONSIBLE INVESTMENT STANDARD

Approved by the plc Board Risk Committee 28 November 2013

### **Group Operating Manual**

All Policies and Standards must be read in conjunction with the Group Operating Manual and Quick Reference Guide.

### **Policy Waiver Process**

The normal policy and Standards waiver process as set out in the Group Operating Manual will apply for any BU or Sub-Business Unit which can demonstrate a justification for any specific additional transition arrangements.

### **Adoption and Implementation**

This standard is effective from 28 November 2013 and must be adopted at Business Unit Board level three months after this date, with a further three months to implement in the sub-Business Units



## 1. Executive Summary

### 1.1 Purpose

The objective of the Group Responsible Investment (RI) Standard is to provide an agreed aspirational standard for RI practices across the Old Mutual Group (the Group).

This standard should be read in conjunction with the Group Responsible Business Policy (Policy 6 of the Group Policy suite and 4.5 of the policy specifically).

This document describes the Group's broad-based approach to RI and the manner in which the standard will be given effect within the scope of our various investment and ownership practices.

The Old Mutual Group RI Standard draws on the United Nations-supported Principles of Responsible Investment (UN PRI) as well other regional codes such as the United Kingdom Stewardship Code and the Code for Responsible Investing in South Africa (CRISA). The standard supports the delivery of the Old Mutual Responsible Business policy, which recognises the potential for indirect social and environmental impacts, both positive and negative, that may arise from our investment and ownership decisions.

The types of matters and issues to be escalated to Group are contained in the Group Operating Manual.

This Standard must be read with the Group Policy Suite Definitions.

### 1.2 Applicability

This standard applies to all Business Units involved in investment practises across the Group, recognising:

- the diversity of asset classes, investment approaches and geographic spread of our investment operations.
- the unique value proposition of the various business units and the independent and decentralised nature of their approach to asset ownership and investment decision making.
- the responsibility of business units to pursue superior risk-adjusted returns on behalf of policy holders, clients and shareholders while, at the same time, ensuring compliance with client objectives, guidelines, and applicable regulatory and business requirements.

Group companies will give effect to this standard in a manner that is consistent with the 'overriding principle' in section 2 of the Group Operating Manual.

The Standard is given effect through the Group Responsible Investment (RI) Committee. The RI Committee meets quarterly and is mandated by the Group Chief Executive to formalise the implementation of the Group RI activities.

## 2. Main Risks Mitigated by these Standards

Responsible Business Risks arise from numerous aspects including:

1. Reputational risk - Reputational risk is the possible loss of the organisation's reputational capital. It can also be defined as the risk of a negative impact that results from the deterioration of Old Mutual's reputation among stakeholders. These potential impacts include revenue loss, reduced customer and employee loyalty, litigation, regulatory sanction or additional oversight, and declines in Old Mutual's share price.
2. Strategic risk – that the pursuit of commercial success in ways that are not ethical and / or do not respect people, wider society and the natural environment may result in financial loss through damages or criminal prosecution and damage to the reputation of the Group.



3. Business/investment risk – the risk that business profitability is negatively impacted as a result of not appropriately incorporating material long-term environmental, social and governance risks into products and the associated investment decision making processes.
4. Legal risk – prosecution of the Group or its Employees for unethical behaviour or not meeting national legislative requirements.
5. Regulatory risk – loss of regulator and Responsible Business organisations confidence and trust which could impact on shareholder and customer confidence and investments in Old Mutual.
6. External validation risk – the Group could fail to meet the criteria for inclusion in the FTSE4Good Index and the JSE Socially Responsible Investment Index listings or need to restate data and our rating in such listings could be reduced or withdrawn.
7. Social and Environmental Risk – the Group could fail to integrate cultural, social and environmental sustainability into its business model. Directly failing to consider and reduce the impact of our operation. Indirectly causing damage to society and the environment through investment activities that cause harm to society or the environment.

### 3. Group Responsible Investment Standard

Standard
<p><b>The Responsible Investment (RI) standard is implemented through the following key activities on behalf of our policyholders, customers and shareholders. These key activities will be undertaken in a manner that is consistent with existing mandates.</b></p>
<p><b>3.1. The consideration of relevant material environmental, social and governance factors through the investment decision-making process</b></p>
<p>We will incorporate the consideration of relevant material environmental, social and governance (ESG) factors into our investment management practices in a manner that is consistent with client mandates, local business requirements and applicable regulations.</p>
<p><b>3.2. To act as a responsible steward of assets</b></p>
<p>Old Mutual will act as a responsible steward of assets on behalf of our policyholders, clients and shareholders. Our listed equity capabilities will maintain publicly available proxy voting policies, vote all proxies in a manner consistent with client guidelines and instructions and local regulatory requirements, and make available our proxy voting records to clients on request. Across the Old Mutual Group we will seek opportunities to work collectively on material ESG issues where appropriate.</p>
<p><b>3.3. To play a leadership role with regard to Responsible Investment</b></p>
<p>We are mindful of our role within the broader investment community and will seek opportunities to play a leadership role regarding RI in situations where that is appropriate. For example this may include, but is not limited to, working with regulators and or industry bodies on RI issues, supporting academic work in the field of RI and engaging with issuers on ESG issues.</p>

## Standard

### 3.4. Transparency and disclosure

We will proactively manage potential conflict of interest situations through the Old Mutual conflict of interest policy and governance structures.

In order to ensure that all stakeholders are able to make informed decisions, we will produce an annual report that discloses our progress and performance regarding RI activities across the Old Mutual Group. This disclosure will be undertaken in line with our annual reporting cycle. We will make this RI standard document publicly available and will review and, if necessary, update it on an annual basis.

## 4. Monitoring and Reporting

- 4.1 Allocate a Business Unit Representative to provide quarter-end status on Responsible Investment KPI data and activity as defined by the Head of Responsible Investment. All information is to be sign-off by the ExCo member or Policy owner responsible for Responsible Business.
- 4.2 Allocate a Business Unit Representative to attend quarter-end status group-wide calls / meetings on Responsible Investment activity.
- 4.3 Provide directly to the Head of Responsible Investment (and record via the Business Unit risk reporting and escalation processes) all material Responsible Investment issues which have arisen and any material Responsible Investment risk events.
- 4.4 Notify the Head of Responsible Investment of any breach or near miss associated with this Policy.
- 4.5 Business Units must provide management information and assurance of compliance with this policy to the BU Chief Executive Officer and to the Group RI Lead, at least twice yearly.

## 5. Escalation

Processes must be in place to enable the identification, recording, reporting and rectification on a timely basis of:

- Breaches of this policy
- Non-compliance with any relevant requirements and/or standards
- Risk control failures, issues and other shortcomings

## 6. Supporting Materials

- Group Operating Manual
- Group Policy Suite Definitions
- Group Responsible Business Policy
- Group Escalation Standards