

Old Mutual Group Policy Suite

1. Details

Title	Responsible Business Policy
Policy Specialist	Helen Wilson, OM plc Corporate Communications
Date Produced / Version	28th January 2009
Audience	Old Mutual Group and all Business Units

2. Summary

This document outlines the Responsible business principles for the Group.

The policy should be reviewed annually by Group Risk and relevant Subject Matter Experts to ensure it reflects the current practice within the Old Mutual Group, and to benchmark against both local & international best practice.

3. Scope

In Scope:	All Old Mutual activities
Out of Scope:	

4. Risks controlled by this Policy

The risk that the pursuit of commercial success in ways that are not ethical and / or do not respect people, communities and the natural environment may result in damage to the reputation of the Old Mutual Group and its subsidiaries. The risk that Old Mutual will not meet the expectation of us as set by our FTSE4Good Index and the Johannesburg Stock Exchange Socially Responsible Investment Index membership.

5. Mandatory requirements

The Old Mutual Group is made up a number of diverse companies spread across different geographies and focusing on different products and services in the financial services sector.

However, we want to ensure that we have a consistent approach to the way we do business, and the values we use to inform our decision making. We have therefore developed a set of principles for each of our key impact areas. These principles set out our top level commitment to operating responsibly wherever we work. We expect Business Units to adopt specific policies that reflect them at a local level. The principles are endorsed by the Board and we are committed to upholding them as a central part of our business process.

(a) Customers

Our ability to manage and grow our customers' investments is the source of our value as a business. Across our business units we will:

- Deal with all our customers and clients in a way that is open, honest and respectful
- Give the best advice that we can, to grow our customers' assets in a way that meets their needs
- Sell and promote our financial products in a way that is transparent and never misleading
- Ensure that we provide clear information to customers about how our funds are invested
- Seek & listen to customer feedback and act on it
- Rectify any mistakes that affect customers as quickly as possible

(b) Employees

We want Old Mutual to be an organisation that people are proud to work for. To attract & retain the best people we work hard to create an environment where they can flourish. Wherever our employees are based, we will:

- Recruit and reward employees fairly and according to merit. This principle is balanced against the need to ensure that we advance transformation in the unique context of our Southern African operations.
- Promote the health and wellbeing of our employees in a work environment conducive to personal and team growth
- Provide opportunities for employee dialogue, listen actively and encourage participation in the resolution of issues
- Invest in employee development to enable] each individual to reach his or her full potential and provide opportunities for career and personal advancement, including involvement in community activities
- Safeguard employee rights, including rights to freedom of association and collective bargaining
- Embrace and encourage the diversity that exists amongst our employees while respecting each persons special individuality

(c) Environment

As a financial services group, we recognise that we have two types of environmental impact: our direct impacts that arise from the running of our offices and branches, and our indirect impacts through the investment decisions that we make.

To minimise our environmental impacts where possible we will:

- Take measures to reduce our energy and water use and the waste we generate in each of our locations;
- Ensure that employees are trained to understand our impacts and their role in minimising these
- Consider environmental impacts as part of our investment decision process where possible

(c) Suppliers

Developing long lasting relationship with suppliers is good for our business. We will:

- Treat our suppliers as partners and strive to create long term relationships
- Act fairly and honestly in all our dealings with suppliers
- Factor the environmental and social impact of our suppliers into our procurement decisions, in accordance with our Group policy on procurement ([link to the Group policy](#))

(d) Society

We recognise that good relations and long-term partnerships with local communities are fundamental to our success. Wherever we operate, we will:

- Consider social impacts as part of our investment decision process where possible
- Give our time and resources to projects that promote education, health and economic development in the communities that we serve
- Use our position as a financial services company to improve levels of financial education and to promote financial inclusion

(e) Risk

We believe that the management of risk and capital is fundamental to creating and protecting shareholder value. We will:

- Continue to enhance the way we measure and manage risk, capital and financial performance
- Invest in risk and capital management to elevate them to best practice standards while incorporating regulatory requirements including solvency II compliance
- Embed a culture where risk management has become part of everyone's role and purpose

(f) Governance and Ethics

We are committed to managing the Group in accordance with the highest standards of corporate governance and best practice. We will:

- Foster a culture of transparency
- Ensure all of our Business Units adhere to the Code of Ethics
- Ensure all the Old Mutual Group follows the recommendations from the Combined Code on Corporate Governance (<http://www.frc.org.uk/CORPORATE/COMBINEDCODE.CFM>)

Management of the principles

Relating to the content above:

- Targets for key components of Responsible Business must be set and regularly monitored
- Old Mutual Group and Business Units must meet Group Corporate Responsibility reporting requirements.
- Management must retain appropriate records explaining its action plans to address CR issues and risks, including the methodologies for identifying them. Historical data including charitable spend and donations figures must be held for 3 years.

6. Policy Breaches

Breaches of this policy must be reported to Group Risk and the policy specialist in accordance with Group risk reporting requirements and the Group Escalation Policy.

7. Supporting Materials

Materials	Where located
Business Conduct and Ethics Principles	

8. Contact point for queries or guidance

Joanne Goddard	Joanne.goddard@omg.co.uk	
Helen Wilson	Helen.wilson@omg.co.uk	

Appendix A – Definitions

Corporate Responsibility represents the pursuit of commercial success in ways that honour ethical values and respect people, communities and the natural environment by addressing the legal, ethical, commercial and other expectations society has for business, and by making decisions that fairly balance the claims of relevant

Responsible practices include all employment matters (such as investing in human capital, health and safety, and managing change) as well relationships with external stakeholders and the environment. The areas over which CR applies have been identified as: Customers, Employees, Environment, Suppliers, Society, Governance and Ethics and Risk.