Module: Introduction

Page: Introduction

0.1

Introduction
Please give a general description and introduction to your organization

Old Mutual is a leading international long-term savings, investment and protection Group. Trusted by our customers for over 166 years, we have been serving the growing insurance and investment needs of local customers, companies and their advisors. Our vision is to be our customers' most trusted partner - passionate about helping them achieve their lifetime financial goals. More information about Old Mutual can be found at http://www.oldmutual.com

0.2

Reporting Year
Please state the start and end date of the year for which you are reporting data.
The current reporting year is the latest/most recent 12-month period for which data is reported. Enter the dates of this year first.
We request data for more than one reporting period for some emission accounting questions. Please provide data for the three years prior to the current reporting year if you have not provided this information before, or if this is the first time you have answered a CDP information request. (This does not apply if you have been offered and selected the option of answering the shorter questionnaire). If you are going to provide additional years of data, please give the dates of those reporting periods here. Work backwards from the most recent reporting year.
Please enter dates in following format: day(DD)/month(MM)/year(YYYY) (i.e. 31/01/2001).

Enter Periods that will be disclosed
Sat 01 Jan 2011 - Sat 31 Dec 2011

0.3

Country list configuration

Please select the countries for which you will be supplying data. This selection will be carried forward to assist you in completing your response

Select country
Austria
Bermuda
Botswana
China
Colombia
Denmark
Dubai
Finland
France
Germany
Hong Kong
India
Ireland
Italy
Kenya
Malawi
Mexico
Namibia
Norway
Poland
Singapore
South Africa
Swaziland
Sweden
Switzerland
United Kingdom
United States of America
Zimbabwe

Select country
Isle of Man

0.4

Currency selection

Please select the currency in which you would like to submit your response. All financial information contained in the response should be in this currency.

GBP(£)

0.5

Please select if you wish to complete a shorter information request

0.6

Modules

As part of the Investor CDP information request, electric utilities, companies with electric utility activities or assets, companies in the automobile or auto component manufacture sectors and companies in the oil and gas industry should complete supplementary questions in addition to the main questionnaire.

If you are in these sectors (according to the Global Industry Classification Standard (GICS)), the corresponding sector modules will be marked as default options to your information request. If you want to query your classification, please email respond@cdproject.net.

If you have not been presented with a sector module that you consider would be appropriate for your company to answer, please select the module below. If you wish to view the questions first, please see https://www.cdproject.net/en-US/Programmes/Pages/More-questionnaires.aspx.

Module: Management [Investor]

Page: 1. Governance

1.1

Where is the highest level of direct responsibility for climate change within your company?

Individual/Sub-set of the Board or other committee appointed by the Board

1.1a

Please identify the position of the individual or name of the committee with this responsibility

Patrick O'Sullivan, the Board Chairman, has overall responsibility for climate change at a Group level, while the internal performance is the responsibility of Don Schneider, Director of Human Resources. He is the Group Executive Committee member with responsibility for reviewing progress and status of objectives regarding climate change. He chairs our Responsible Business Committee (RBC), which was established in 2009 to provide leadership and direction for the Group on the risks and opportunities related to our social and environmental impacts, including climate change.

The RBC reports directly through Don Schneider into the Group Executive Committee. Updates, which include material issues relating to climate change, are given at least twice a year to the Group Executive Committee and twice a year to the Board.

1.2

Do you provide incentives for the management of climate change issues, including the attainment of targets?

Yes

1.2a

Please complete the table

Who is entitled to benefit from these incentives?	The type of incentives	Incentivised performance indicator
Corporate executive team	Monetary reward	For the Group Director of Human Resources, who chairs the Group Responsible Business Committee, management of climate change issues are included in his objectives.

Who is entitled to benefit from these incentives?	The type of incentives	Incentivised performance indicator
Environment/sustainability managers	Monetary reward	The Head of Responsible Business, Helen Wilson, has monetary incentives linked to the management of climate change initiatives. Targets are set across a range of areas including internal climate change awareness, environmental management plans and monitoring of Key Performance Indicators including Group GHG reduction targets.
Facility managers	Monetary reward	Buildings and facilities managers have energy management and reduction targets within their individual performance targets.
Other: Nedbank employees	Monetary reward	Greenhouse gas reduction targets are included among the performance indicators for Nedbank employees. Other forms of recognition and prizes are also used to help to drive the Nedbank green agenda.
Other: Old Mutual Property managers	Monetary reward	10% of the Key Performance Indicators for Old Mutual Property managers and teams are linked to green building philosophies and standards.

Page: 2. Strategy

2.1

Please select the option that best describes your risk management procedures with regard to climate change risks and opportunities

Integrated into multi-disciplinary company wide risk management processes

2.1a

Please provide further details (see guidance)

- **Scope of process:** Every business activity in our Group requires us to put capital at risk, in exchange for the prospect of earning a return. This means risk management is integral to the Group's decision-making and management processes, this includes the process to identify opportunities and risks associated with climate change. All risks are categorised as either a business risk, asset/liability management risk, operational risk, credit risk, liability risk or market risk. For climate change this includes all regulatory, physical, reputational and business risks and covers Old Mutual's entire risk universe - businesses and operating divisions, geographical locations and legal entities.

- **How risks/opportunities are assessed at a company level:** We have a Group Executive Risk Committee (GERC) which comprises senior Group Executives from Risk, Actuarial, Capital, Governance and Compliance, and Internal and External Audit - which acts as an advisory body to the Chief Risk Officer and Group

Chief Actuary. The Chief Risk Officer has responsibility for ensuring strategic business decisions are aligned to the Group's risk appetite, including the process to identify opportunities and risks associated with climate change. Our Responsible Business Committee (RBC) is an additional governance structure we have put in place to ensure that climate change related risks and opportunities are identified and addressed across the Group. Climate change risks are fed directly to the RBC quarterly through the Group Head of Responsible Business. This structure provides a robust system for maintaining day to day management of climate change issues, as well as a route to raise, discuss and escalate new issues as they arise. The GERC reports to the Board Risk Committee.

- **How risks/opportunities are assessed at a business/asset level:** Risk frameworks and governance are designed and overseen centrally but implemented by our global businesses locally. Business representatives, credit officers, risk managers and compliance officers assume responsibility for the assessment, review and reporting of risks arising within their respective areas. Ongoing reviews are performed of risk identification, exposure levels and remedial action plans at a business level. In addition, at Nedbank we use The Equator Principles as a credit risk management framework for determining, assessing and managing environmental and social risk in Project Finance transactions. The Group Operating Model (GOM), which is applied across the Group, includes the Responsible Business Policy which in turn, includes how each business unit is expected to manage their approach to climate change risk and opportunity.Each business unit is responsible for integrating climate change risk and opportunities in new product and service development.

- **Frequency of monitoring:** Risks are assessed on an ongoing basis. Risk registers are updated on a monthly basis and the top risks identified by each business are reported to the Group Risk Committee meetings quarterly.

- **Criteria for materiality/priorities** To consider all risks consistently, all businesses use the industry standard approach to identifying, assessing and controlling risk - Risk and Control Self-Assessments (RCSA). RCSA is a key component of the Old Mutual Risk Framework and exposure to risk is assessed by looking at the potential "impact" (very high, major, moderate, minor, low) and "likelihood" (Rare, Possible, Probably, Likely, Almost certain) of a risk before taking into consideration any controls or other mitigation put in place to manage the risk, including internal and external stakeholder engagement. As with all risks, climate-change related risks and opportunities undergo RCSA.

- **To whom are the results reported:** Each business completes RCSAs regularly and escalates any significant new risks or issues to senior management immediately. This gives Group management an up-to-date view of risks and ensures that decision-makers are aware of areas of concern promptly so that appropriate action can be taken. The Chief Risk Officer provides quarterly reports on issues discussed by the GERC and risk generally to the Group Executive Committee and the Group Audit and Risk Committee. Twice a year the Responsible Business Committee reports, through its Chair Don Schneider, to the Group Executive Committee and Board, which includes material issues relating to climate change.

2.2

Is climate change integrated into your business strategy?

Yes

2.2a

Please describe the process and outcomes (see guidance)

The process by which the strategy is influenced:

- We engage with stakeholders internally and externally to understand their needs and expectations, and to balance addressing all of these effectively and appropriately. In most cases, our relationships with stakeholders are managed at a local level. For example, at the end of 2011/beginning of 2012 interviews were held by external sustainability experts with Nedbank's top management which fed into Nedbank's strategy development.
- The risks identified at a business level inform the Old Mutual Group Risk Strategy which informs the Group's Business Strategy. Social and environmental risks and opportunities our integrated into this Group analysis processes and strategy. All businesses undergo an annual strategy review process which incorporates a rolling three-year business plan to ensure that plans align with strategy and reflect risk appetite limits.
- Each business reports quarterly their energy consumption at a Group level to monitor and measure the Group's climate change impact and progress towards carbon emission reduction target. This performance is reported annually in the Responsible Business Report and Annual Report.

What aspects of climate change have influenced Old Mutual's strategy

- Increasing energy costs and carbon-related legislation and fluctuations in temperature affect our large property portfolios. Old Mutual Property has developed its own strategy and work towards its target of emissions reduction.
- Extreme weather events cost our insurance business through increased claims, e.g. against crop insurance policies. Our insurance business, Mutual & Federal, launched their own environment policy in 2011.
- Changes in availability and distribution of natural resources impacts the supply chains of businesses in which we invest. Understanding to what extent, and how, climate change impacts or enhances the value of investments is crucial if we are to protect shareholder value, respond to customers' increasing demands and remain competitive.

Short term strategy changes (1-5 years)

- One of the most important components of our short-term strategy that is influenced by climate change is carbon emissions from our operations. Monitoring and measuring our emissions helps us identify efficiency gains and manage them effectively. There is some independent verification across our different businesses. At the start of 2011, we developed a Group Climate Change Strategy to help us reduce our climate change impacts and improve our energy efficiency. We have set up 12 Carbon Taskforces across the business to implement the strategy, acting as a focal point in helping deliver our target and build on the multitude of activity already going on around the Group. In 2011 we expanded our data collection to include Skandia International and property portfolios in South Africa.

Long term strategy changes (30 years)

- The most important components of the long-term strategy that have been influenced by climate change have been around how we manage and incorporate environmental factors in our investments. During 2011 we developed governance structures to support a more co-ordinated and consistent approach to responsible investment across the Group. We established a Responsible Investment Committee for the Long-Term Savings division to help set the investment criteria appropriate for Old Mutual and to help integrate these new decisions making behaviours across the Group.
- Across the Group we also make investments that aid the long-term transition from a carbon-intensive economy to more efficient low-carbon alternatives. For example a consortium of Old Mutual South Africa and Macquarie Capital secured a deal to start an infrastructure project that will build a 300-megawatt wind farm in South Africa.

- We work to influence policy and research into climate change – to create the consensus needed for clear international policy and legislative frameworks. For example through Mutual & Federal we provided insurance for a research expedition on climate change in sub-Saharan Africa in 2011. Old Mutual also sponsored a dinner for the Transitional Committee which is overseeing the design of the UN Green Climate Fund to support activities in developing countries in tackling climate change.
- We are members of various groups across the world that help us to share best practice in the financial services sector and learn from emerging knowledge on the impacts of climate change. These include Nedbank's participation in the United Nations Environment Programme Finance Initiative and the Group's commitment to the United Nations Global Compact.

Strategic advantage
Climate change is widely recognised as the greatest environmental challenge facing the world today. By integrating climate change impacts in our business strategy, we can not only mitigate the risks that they represent, making us more resilient and better equipped for a carbon constrained future, but can exploit the opportunities it creates, such as:

- More efficient building stock will directly reduce our operational costs and potentially increase the value of our property investment portfolios.
- Our focus on responsibly managing our investments means that now we will be able to take advantage of the opportunities of the new investment markets and product opportunities
- Our work to influence policy, investing in research into climate change and sharing best practice means that Old Mutual will be well informed and better prepared for developing products and services that help clients mitigate and adapt to climate change leading to increased client base
- Attract and retain motivated and high calibre employees who are increasing attracted to organisations with a strong reputation as a responsible business.

Most substantial business decisions

- To continue to develop appropriate governance structures across the Group to support our evolving approach to responsible investment
- To implement the Responsible Investment Committee 2012 workplan, which includes developing responsible investment and ownership principles for our owned and managed investments
- To commit to becoming signatories of the UN-backed PRI
- To revisit our Group-wide investment statement to incorporate ESG criteria
- To integrate our climate change activity across the property portfolios
- To build a baseline of climate change activity across our Old Mutual Emerging Markets business, including comparative performance

2.2b

Please explain why not

2.3

Do you engage with policy makers to encourage further action on mitigation and/or adaptation?

Yes

2.3a

Please explain (i) the engagement process and (ii) actions you are advocating

COP17 held in Durban, SA, between 28 November and 9 December 2011.
Engagement method:

- Sponsorship of events and participation in speaking and attending conferences and discussions for example:
    - Nedbank sponsored the World Climate Summit and Climate Action Event, many group executives spoke, sharing the stage with President Jacob Zuma and other dignitaries.
    - The Nedbank Group Kingsmead building played host to a number of key events, addressing critical issues around energy, water and food security.
    - Nedbank Group's partnership with Cambridge Programme for Sustainable Leadership resulted in the popular COPpuccino sessions, which brought together thought leaders and analysts to give a business perspective on each day's proceedings at COP17
    - At a Group level we became a signatory of The 2°C Challenge Communiqué – an international coalition of business leaders calling on governments to take action at a national level to ensure a successful transition to a climate-resilient economy

Topic: International multi-lateral cooperation on global climate change
Action advocated: Governments to take action at a national level to ensure a successful transition to a climate-resilient economy through a practical global agreement to drive the reduction of man-made greenhouse gas emissions in a way that is considered fair and binding by all participants.

Code of Responsible Investing in South Africa (CRISA)

Engagement method:

- Old Mutual Investment Group, South Africa (OMIGSA) was actively involved in the drafting of the Code of Responsible Investing in South Africa (CRISA) throughout 2011. Jon Duncan, ESG Analyst at Old Mutual, was an active member of the Drafting Committee

Topic: Integration of social, environmental and governance factors into investment decisions.
Action advocated: For Old Mutual, responsible investment is about making decisions that allow social, environmental and governance (ESG) impacts to be taken into account, and quantifying the impact of global changes on our financial return so that potential risks and opportunities are managed. In 2012 we will continue our support through the CRISA drafting committee, and contribute to the development of a series of supporting guideline documents.

South Africa renewable energy projects

Engagement method and nature of engagement:

- We use various methods of engagement. Most of these methods entail feeding input from Nedbank into business or industry bodies like the National Business Initiative (NBI) or Business Unity South Africa (BUSA). Direct feedback from Nedbank to the specific government body or other policy originators is also a route followed. Stakeholder consultation sessions are also attended and input is provided by Nedbank at these sessions.

Topic and nature: Policy and legislation: A second round of renewable energy projects in South Africa
Action advocated: Nedbank is engaging with various government departments and external stakeholders to advocate a possible second round of sanctioned renewable energy projects. The perceived impact will be a diversified pool of energy sources for South Africa.

Energy efficiency labelling in South Africa

Engagement method and nature of engagement:

- We use various methods of engagement. Most of these methods entail feeding input from Nedbank into business or industry bodies like the National Business Initiative (NBI) or Business Unity South Africa (BUSA). Direct feedback from Nedbank to the specific government body or other policy originators is also a route followed. Stakeholder consultation sessions are also attended and input is provided by Nedbank at these sessions.

Topic and nature: Policy and legislation: on labelling of domestic devices to indicate energy efficiency
Further actions advocated: Nedbank is advocating and supporting the current work done regarding labelling of domestic devices to indicate energy efficiency. The perceived impact will be a more informed South African citizen that can reduce greenhouse gas production through changing which products they support.

Page: 3. Targets and Initiatives

3.1

Did you have an emissions reduction target that was active (ongoing or reached completion) in the reporting year?

Intensity target

3.1a

Please provide details of your absolute target

ID	Scope	% of emissions in scope	% reduction from base year	Base year	Base year emissions (metric tonnes CO2e)	Target year	Comment

3.1b

Please provide details of your intensity target

ID	Scope	% of emissions in scope	% reduction from base year	Metric	Base year	Normalized base year emissions	Target year	Comment
1	Scope 1+2	15%	6%	metric tonnes CO2e per FTE employee	2010	2.47	2020	Employee occupied properties include all locations where Old Mutual employees are based and operate from. In our employee occupied properties, we decreased our emissions by 6% to 2.33 tonnes of CO2e per employee (2010: 2.47 tonnes CO2e/employee) through a wide range of structural and behavioural initiatives.
2	Scope 1+2	85%	10%	metric tonnes CO2e per square meter	2010	0.23	2020	The investment property portfolio includes the property asset management business and properties invested in and managed to create value and client returns. In our investment property portfolio, we decreased our carbon emissions by 10% to 0.21 tonnes of CO2e per square meter (2010: 0.23 tonnes CO2e/m2). This success is largely due to continued efforts made by the Old Mutual Property team in South Africa to improve the way properties are managed and developed.

3.1c

Please also indicate what change in absolute emissions this intensity target reflects

ID	Direction of change anticipated in absolute Scope 1+2 emissions at target completion?	% change anticipated in absolute Scope 1+2 emissions	Direction of change anticipated in absolute Scope 3 emissions at target completion?	% change anticipated in absolute Scope 3 emissions	Comments
3	Decrease	20	Decrease	20	At a Group-wide level Old Mutual has reduced its scope 1 and scope 2 emissions from 675,220 tonnes CO2e in 2010 to 567,795 tonnes CO2e in 2011 which equates to a 16% decrease in total emissions. A 20% decrease in emissions intensity will also equate to a reduction in absolute emissions if there is no major shift in employees.

3.1d

Please provide details on your progress against this target made in the reporting year

ID	% complete (time)	% complete (emissions)	Comment
1	10	30	Old Mutual has made very good progress towards reducing our emissions in line with our target in our first year of the target. We are aware that reductions will be harder to make as time goes on but through the focus and effort of the environment taskforces to engage employees further we anticipate fulfilling our target of 20% reduction by 2020 (from 2010 baseline).
2	10	50	Old Mutual has made very good progress towards reducing our emissions in line with our target in our first year of the target. We are aware that reductions will be harder to make as time goes on but through continued effort on improving the efficiency of our property portfolios we anticipate fulfilling our target of 20% reduction by 2020 (from 2010 baseline).

3.1e

Please explain (i) why not; and (ii) forecast how your emissions will change over the next five years

3.2

Does the use of your goods and/or services directly enable GHG emissions to be avoided by a third party?

Yes

3.2a

Please provide details (see guidance)

We have developed a range of products and services that are designed to help our customers reduce their GHG emissions:

- **Providing energy efficient buildings for our tenants:** Old Mutual Property has £2.2 billion of assets under management, with over 330 buildings over 2,600,000m² gross lettable area, accommodating over 4,400 tenants. We recognise the benefits of employing new materials and designs in the buildings we develop, and understand how location selection, technologies and management techniques can reduce emissions from our own operations and those of our tenants. Old Mutual Property has a green building strategy which provides us with a structured approach to improving the environmental sustainability of the buildings in our existing portfolio and the ones we are constructing. For example significant savings have been achieved through advanced air-conditioning controls, high efficiency lighting replacement initiatives, timers, zoned sensor lighting and perimeter sensors for natural daylight adjustment.

- **Reducing the environmental impact of our investments:** Our investment decisions have significant impacts on the environment and society, and on the communities where the investments are based. These include climate change related impacts. Across the Group we also make investments that aid the long-term transition from a carbon-intensive economy to more efficient low-carbon alternatives. For example in 2011 a consortium of Old Mutual South Africa and Macquarie Capital secured a deal to start an infrastructure project that will build a 300-megawatt wind farm in South Africa. During 2011 we developed governance structures to support a more co-ordinated and consistent approach to responsible investment across the Group. We established a Responsible Investment Committee for the Long-Term Savings division to help set the investment criteria appropriate for Old Mutual and to help integrate these new decisions making behaviours across the Group.

- **Helping our retail banking customers reduce GHG emissions:** At Nedbank we offer the following services and products that specifically enable our customers to avoid or offset GHG emissions:
    - Nedbank Capital has a dedicated Carbon Finance Team that provides carbon advisory and footprinting services, identification and development of Clean Development Mechanism projects and carbon trading.
    - In 2011, Nedbank launched a green exchange-traded fund on the JSE ranking South Africa's top 20 listed companies in terms of sustainability, using data from the Carbon Disclosure Project
    - Internet banking and cell phone banking services that reduce travel to branch outlets
    - Expansion of Automated Teller Machine(ATM) and Self Service Terminals(SST) network – cutting down on the required client transport
    - Electronic client statements and client option for receipt-free transactions at ATM's and SST's which reduces paper use by clients

- **Estimation of avoided emission including timescale over which emissions are avoided or baseline year:** Nedbank have calculated the reduction of emissions from reduced client travel due to electronic services at an estimated 6,000tCO2e per annum. The biggest benefit from these initiatives is expected in rural communities, where access to banking services is frequently remote and very inconvenient. In various parts of the Group, videoconferencing has been introduced with particular focus on reducing air travel between Johannesburg and Cape Town and London and South Africa.

Methodology:
Methodology based on DEFRA emission factors and process. Assumption: Based on 25,000 people using electronic channels 4 times per month and avoiding a 20km round-trip by Minibus Taxi. The result is that approximately 24,000,000 passenger km per year is reduced. This equates to a reduction of more than 1,700,000 taxi round trips. A value of 0.21 kgCO2e/vehicle km was assumed based on information from DEFRA emission tables. The result is that more than 5,200 tCO2e is reduced from travel alone. Taking electricity use and reduced paper consumption into account ought to increase the offsetting to approximately 6,000 tCO2e.
Whether considering originating credits:
Registering credits for avoided client and/or staff transport is being considered. Such an initiative could be extremely difficult due to potential changes in behaviour, i.e. different travelling behaviour.

3.3

Did you have emissions reduction initiatives that were active within the reporting year (this can include those in the planning and/or implementation phases)

Yes

3.3a

Please identify the total number of projects at each stage of development, and for those in the implementation stages, estimated CO2e savings

Stage of development	Number of projects	Total estimated annual CO2e savings (only for rows marked *)
Under investigation	9	120000
To be implemented*		
Implementation commenced*		
Implemented*	1	
Not to be implemented	7	22000

3.3b

For those initiatives implemented in the reporting year, please provide details in the table below

Activity type	Description of activity	Estimated annual CO2e savings	Annual monetary savings (unit currency)	Investment required (unit currency)	Payback period
Energy efficiency: building services	Nature of activity: Given that the largest percentage of Nedbank's carbon footprint (75%) is from electricity usage, 2011 saw intense efforts to reduce usage wherever possible. Initiatives included the installation of motion sensors, heat pumps, blockout blinds and the upgrading of numerous building management systems. Scope of activity: All electricity purchases relate to Scope 2 emissions. Voluntary vs. mandatory: All reductions are deemed voluntary and aligned to our commitment to the National Energy Efficiency Accord. Development stage: All planned initiatives were executed. Further initiatives are planned for 2012. Expected lifetime: The equipment installed typically have a technical lifespan of 7 – 10 years. The installations were staggered throughout 2011 and will continue in 2012. The monetary savings will then only be realized on a staggered basis. Hence the payback period is more than 3 years. Are these actions being implemented? Yes, some of these activities were implemented in 2011 already and others are still being implemented. Do these actions have carbon savings? Yes, if successful it will reduce Nedbank's footprint by 10% based on the 2011 footprint.	8000	387000	120000	>3 years
Fugitive emissions reductions	Nature of activity: Projects are underway to optimize the diesel consumption of the standby generators used as backup power at the main facilities. Scope of activity: Diesel combustion in generators will relate to Scope 1 emissions. Voluntary vs. mandatory: All reductions are deemed voluntary. Development stage: All planned initiatives were executed. Further initiatives are planned for 2012. Expected lifetime: The equipment installed typically have a technical lifespan of 5 – 12 years. The investigations and implementation were staggered throughout 2011 and will continue in 2012. The monetary savings will then only be realized on a staggered basis. Hence the payback period is more than 3 years. Are these actions being implemented? Yes, some of these activities were implemented in 2011 already and others are still being implemented. Do these actions have carbon savings? Yes, if successful it will reduce Nedbank's footprint due to a reduction in the use of diesel.	800	1000000	1700000	>3 years
Behavioral change	Nature of activity: Further optimization of paper as used by internal mailing services will be reduced. This will lead to a reduction in Scope 3 emissions. Scope of activity: Paper use relate to Scope 3 activities.. Voluntary vs. mandatory: All reductions are deemed voluntary. Development stage: All planned initiatives were executed. Further initiatives are planned for 2012. Expected lifetime: The project has got a 1 year lifetime. As the	150	80000	8000	<1 year

Activity type	Description of activity	Estimated annual CO2e savings	Annual monetary savings (unit currency)	Investment required (unit currency)	Payback period
	behaviour is changed it is expected that future paper reductions will be perpetual. The investigations and implementation were staggered throughout 2011. The monetary savings will then only be realized on a staggered basis. Are these actions being implemented? Yes, some of these activities were implemented in 2011 already and others are still being implemented. Do these actions have carbon savings? Yes, if successful it will reduce Nedbank's footprint due to a reduction in the use of paper.				
Energy efficiency: building services	Under scope 2 emissions significant savings have been achieved through high efficiency lighting replacement initiatives, timers, zoned sensor lighting and perimeter sensors for natural daylight adjustment in Old Mutual Property. This activity was voluntary. Under scope 1 emissions savings were experienced through improvements in air conditioning controls. This activity was voluntary.	27142			

3.3c

What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Compliance with regulatory requirements/standards	Group governance and risk management procedures ensure that appropriate investments are made to comply with all regulator requirements, including climate change related ones.
Employee engagement	Engaging our employees in environmental efforts is an important part of delivering change across the Group. We promote a culture of efficiency and are continually looking for opportunities to reduce resource use. Much of this work has been conducted at individual business level. However, we also worked to share best practice across the Group through meetings, workshops and group e-magazines.
Internal incentives/recognition programs	Monetary incentives are linked to climate change related objectives for employees within the Responsible Business function, with targets set across a range of areas including climate change awareness of employees, environmental management plans and GHG target reductions. Buildings and facilities managers have energy management and reduction targets within their individual performance targets.
Dedicated budget for other emission reduction activities	At Nedbank, reducing our impact on the environment is a strategic imperative. As such dedicated budgets are available to realize this imperative. In addition self imposed carbon neutrality results in an increased pressure to reduce electricity

Method	Comment
	consumption.

3.3d

If you do not have any emissions reduction initiatives, please explain why not

Page: 4. Communication

4.1

Have you published information about your company’s response to climate change and GHG emissions performance for this reporting year in other places than in your CDP response? If so, please attach the publication(s)

Publication	Page/Section Reference	Identify the attachment
In annual reports (complete)	Responsible business section (p.86-88)	Old Mutual Annual Report 2011
In voluntary communications (complete)	Responsible environmental management (p.28)	Responsible Business Report 2011
In voluntary communications (complete)	Environmental sustainability	2011 Nedbank Group Integrated Report 2011
In voluntary communications (underway) – previous year attached	Minimising and managing our impact on the environment (p.58-61)	Old Mutual Emerging Markets Sustainability Report 2010

Attachments

https://www.cdproject.net/Sites/2012/07/13807/Investor CDP 2012/Shared Documents/Attachments/InvestorCDP2012/4.Communication/Nedbank Group Integrated Report 2011.pdf
https://www.cdproject.net/Sites/2012/07/13807/Investor CDP 2012/Shared Documents/Attachments/InvestorCDP2012/4.Communication/Old Mutual Emergying

Markets Sustainability Report 2010.pdf
https://www.cdproject.net/Sites/2012/07/13807/Investor CDP 2012/Shared Documents/Attachments/InvestorCDP2012/4.Communication/Old Mutual Annual Report 2011.pdf
https://www.cdproject.net/Sites/2012/07/13807/Investor CDP 2012/Shared Documents/Attachments/InvestorCDP2012/4.Communication/Responsible Business Report 2011.pdf

Module: Risks and Opportunities [Investor]

Page: 2012-Investor-Risks&Opps-ClimateChangeRisks

5.1

Have you identified any climate change risks (current or future) that have potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

Risks driven by changes in regulation
Risks driven by changes in physical climate parameters
Risks driven by changes in other climate-related developments

5.1a

Please describe your risks driven by changes in regulation

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
RR1	Uncertainty surrounding new regulation	A number of countries where we have operations– including in the EU, South Africa, United States, India and China – are involved in on-going negotiations to determine international agreements and action on climate change to replace the Koyoto Protocol when it finishes at the end of 2012. As negotiations are still underway, the exact nature of the legislation cannot be predicted, although	Increased operational cost	Current	Indirect (Supply chain)	Virtually certain	Medium

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
		reduction goals for individual nation states already support a path of deep and consistent GHG emission reductions. The uncertainty of the exact nature of the agreements effects our ability to effectively assess long term investment decisions, which we define here as an indirect operational cost (as opposed to a direct operational cost which would include our office operations). We have £267.2bn funds under management that could potentially be influenced by changes in climate change regulation.					
RR2	Carbon taxes	Carbon taxes are being developed by a number of national Governments in countries where we operate. (1) In 2009 South Africa announced that it would reduce domestic GHG emissions by 34% by 2020 and 42% by 2025 from business as usual. It has proposed a carbon tax as the primary economic policy instrument for curbing these emissions. The exact timeline for the introduction of a carbon tax is unknown, but the impact on Old Mutual will be in our direct (operation) and indirect (investment) operational costs. Our direct (operational) costs will be incurred through higher cost of energy efficient equipment and infrastructure, particularly for our extensive property portfolio in South Africa where we own and manage over 344 buildings, accommodating over 4,400 tenants. (2) In the UK 2011 Budget, plans were introduced to replace the UK Climate Change Levy with a guaranteed minimum (“floor”) price for carbon emissions produced under the EU ETS of £16 a tonne in 2013, rising to £30 by 2020. This is a tax on energy (lighting, heating and power) delivered to industrial and commercial users, with the aim of improving energy efficiency. Coal and gas plants will start paying the tax in 2013, based on how much carbon they emit. They will be allowed to pass on the cost to consumers in higher bills. This legislation is likely to increase our energy costs but the more significant impact is likely to be on our energy intensive investments. Their cost of operation will increase and therefore potentially their return on investment will be lower. This is most likely to affect our investments made in the UK through Skandia UK, Skandia International and Skandia Investment Group. (3) In December 2009 the Obama administration officially pledged that the United States would cut its	Increased operational cost	1-5 years	Direct	Virtually certain	Low-medium

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
		GHG emissions in the range of 17% below 2005 levels by 2020. Although US Congress continues deliberations over how to reduce emissions in line with this pledge, the expected impact on Old Mutual will be to increase our direct operational costs, and the costs to some of the companies that we invest in through our funds (indirect operational costs). This will affect our Asset Management business based in the US which represents £148.8bn funds under management.					
RR3	Cap and trade schemes	The third phase of the EU Emissions Trading Scheme will begin in 2013, and will include greenhouse gases other than carbon dioxide and incorporate all major industrial emitters within the EU. The new measures will also reduce the emission allowances put on the market year on year so that emissions covered by the trading scheme will be reduced by 21% from 2005 levels in 2020. This will not directly affect our operational activities in the EU, but our investment teams are aware of the possible business implications of the legislation to our investment decisions.	Increased operational cost	1-5 years	Indirect (Supply chain)	Virtually certain	Low-medium
RR4	Cap and trade schemes	Old Mutual plc and Skandia operations in the UK are affected by the CRC Energy Efficiency Scheme and are required to purchase allowances to cover the emissions resulting from their electricity and fossil fuel consumption. The UK Government has published a consultation on simplifying the CRC Energy Efficiency Scheme which aims to streamline and simplify the scheme. Reporting and compliance has direct operational cost implications for our UK business and covers 13 properties. The simplification of the scheme is not expected to have a material impact on the compliance costs for Old Mutual.	Increased operational cost	1-5 years	Direct	Virtually certain	Low-medium
RR5	Fuel/energy taxes and regulations	The National Energy Regulator of South Africa (NERSA) granted state-owned utility provider, Eskom, tariff increases from 41.31c per kWh in 20010/11 to 65.06c per kWh 2012/2013. Electricity is by far the biggest energy source for our South African operations – including Nedbank, Old Mutual South Africa and Mutual & Federal. The electricity increases will have a significant impact on our expected operational costs.	Increased operational cost	Current	Direct	Virtually certain	Medium
RR6	Air pollution limits	The South African Government has recently introduced more stringent national air quality targets and indications are that more	Increased operational	Current	Direct	Very likely	Low-medium

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
		stringent targets will be set in the future. This could result in the need for us to replace all of our standby electricity generation units before the end of their technical lifespan. All Nedbank branches, for example, should have secured standby electricity at all time. This could result in increased capital expenditure.	cost				

5.1b

Please describe (i) the potential financial implications of the risk before taking action; (ii) the methods you are using to manage this risk; and (iii) the costs associated with these actions

Costs of risk:
RR1 –Old Mutual has £267.2bn funds under management in 2011, all of which could potentially be affected in some way by changes in global climate change legislation.
RR2 - Carbon taxes will affect our direct operations most significantly in South Africa where 80% of our emissions are produced, primarily through electricity consumption. The risk is also to our investments:

- OMIGSA has £40.5bn assets under management that could be affected by South Africa carbon tax
- Skandia Investment Group has £7.8bn assets under management that could be affected by EU carbon taxes
- USAM have £148.8bn funds under management that could be affected by changes in US carbon taxes

RR3 – Old Mutual has £267.2bn funds under management, all of which could potentially be affected in some way by changes in global climate change legislation.
RR4 – Compliance costs for CRC for Old Mutual are somewhere in the region of £200k – £300K. The cost of taking no action and non-compliance would be five times that cost, criminal charges and reputational damage.
RR5 – Electricity is by far the biggest energy source for our South African operations with 85% of our total emissions originating in South Africa. The electricity increases will have a significant impact on our expected operational costs.
RR6 - There is zero financial implication of the risk before taking action

Management of risks:
RR1

- Our asset diversification policy and in-house Risk Exposure Aggregation System (REAS) ensures that we do not have a concentration of investment in a particular sector or investment type. We also include environmental factors (including climate change) into our investment decisions as part of our ESG assessment of companies.

- We engage with regulators and policy makers at a local business level to inform and understand the latest climate change legislation. In 2011 Old Mutual sponsored and facilitated a number of events at the 17th UN Conference of the Parties in Durban to help find global solutions for climate change.
- We have dedicated Group and business compliance teams who closely monitor new and changing regulatory developments and liaise regularly with their local regulators. The Group compliance function undergoes an independent review annually by the Group Internal Audit function to ensure an objective view of the status of compliance.

RR2

- Old Mutual Asset Management's Carbon Taskforce met every three weeks in 2011 to research ways to reduce their carbon footprint, monitor changes and create awareness throughout their office and reduced the emissions in their Boston Head Office by 23% during 2011.
- Nedbank has engaged various national and international organisations regarding the proposed domestic carbon tax e.g the South African government.
- Nedbank is working to develop more products and services that will help clients manage and adapt to the impacts of a carbon tax e.g. Nedbank's Solar Geyser proposition was launched in 2011. This offers clients the option to replace a burst geyser with a solar water heater and manages the receipt of the Eskom rebate on customer's behalf.

RR3

- Our asset diversification policy and in-house Risk Exposure Aggregation System (REAS) ensures that we do not have a concentration of investment in a particular sector or investment type. We also include environmental factors into our investment decisions as part of our ESG assessment of companies. During 2011 we developed governance structures to support a more co-ordinated and consistent approach to responsible investment across the Group. We established a Responsible Investment Committee for the Long-Term Savings division to help set the investment criteria appropriate for Old Mutual and to help integrate these new decisions making behaviours across the Group.

RR4

- Old Mutual plc established a CRC Energy Efficiency Scheme (CRC) Working Group, which meets at least quarterly to manage our CRC responsibilities. The CRC Working Group, chaired by the Head of Responsible Business, reports into the Responsible Business Committee. This Working Group receives support from our legal, finance and compliance teams where needed.
- Budget is allocated for compliance measures where applicable. For example, resources may be allocated to meet the costs of improvements in infrastructure necessary for legislative compliance.

RR5

- Our Group Climate Change Strategy aims to reduce our carbon emission and thereby improve our energy efficiency, reducing the affect of fuel increases in South Africa. At Nedbank, for example, initiatives have been completed by the Facilities Management team(s) to ascertain the pollution generated from generators. The Nedbank Menlyn Maine office park has reduced its electricity requirements and has received a 4 star Green Building rating.

RR6

- Nedbank is exploring cogeneration and tri-generation for its buildings in the future.

Cost of managing risk:
RR1, RR3, RR4 & RR5 – The development of remedial action plans to mitigate risks is an integral part of Old Mutual's risk management strategy and as such, the financial costs for climate change specific activities do not represent a material additional cost and are not measured independently from the wider risk management costs.
RR2 – The direct expense incurred at this stage relates to the research done to evaluate various electricity generation options and possible future product offerings. These studies were in the order of £43,000

RR6 – The direct expense incurred at this stage relate to the research into different electricity generation options and the air pollution levels, which are approximately £4,000 per installation.
RR7- The direct expense incurred at this stage relates to the research done to evaluate various electricity generation options. These studies were in the order of £4,000 and the identified equipment in the range of £43,000 per installation.

5.1c

Please describe your risks that are driven by change in physical climate parameters

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
PR1	Other physical climate drivers	Extreme weather could cost our insurance business heavily through increased claims, for example against building and crop insurance policies. Shifting disease vectors will also have an impact on mortality and morbidity rates affecting actuarial tables. As a result, the life assurance business remains sensitive to changes in these trend lines. These risks are particularly relevant to Mutual & Federal and Old Mutual South Africa who offer extensive health and life insurance related products and operate in a part of the world that is likely to be most heavily affected by climate change and has a less developed health care system for dealing with these challenges.	Inability to do business	6-10 years	Indirect (Client)	Very likely	Medium-high
PR2	Change in mean (average) temperature	Small increases in average temperatures across all regions where we have operations have the potential to impact on our costs through higher energy consumption for internal climate control. This will most significantly impact Old Mutual Property, based in South Africa which owns and manages over 330 buildings.	Increased operational cost	>10 years	Direct	More likely than not	Low-medium
PR3	Uncertainty of physical risks	Changes in the availability and distribution of natural resources due to changes in climatic conditions caused by climate change could seriously affect our investment portfolio with climate change having negative impacts on the supply chains of businesses in which we have investments. This will primarily impact our Asset Management business.	Increased operational cost	Unknown	Direct	More likely than not	Medium

5.1d

Please describe (i) the potential financial implications of the risk before taking action; (ii) the methods you are using to manage this risk; and (iii) the costs associated with these actions

Financial implications
PR1 – The business which will incur the most significant cost is Mutual & Federal, which provide short-term insurance and operates in Southern Africa with £89m AOP and 6% of Group AOP
PR2 – This will most significantly impact Old Mutual Property, based in South Africa which owns and manages 344 properties
PR3 –This will primarily impact our Asset Management business which represents 6% of Group AOP
Methods to manage risks
ALL risks (PR1, PR2, PR3, PR4):

- We are members of various groups across the world that help us share best practice in the financial services sector and emerging knowledge on the impacts of climate change, such as through Nedbank's participation in the United Nations Environment Programme Finance Initiative
- We also invest in research into the impacts of climate change. For example, in 2011 we awarded a PhD scholarship to Imperial College London student to look into how climate change alters species distribution and agricultural systems

PR1

- Our Group-level liability risk policy sets out the internal controls and processes that we must follow in long-term and short-term insurances. To mitigate the risks we face from natural and non-natural disasters, regardless of the cause, we have a catastrophe stop and loss and excess of loss reinsurance treaty in place which covers claims from an incident occurring within a specified period between a range of specified limits. We also use actuarial models to calculate premiums and monitor claims patterns using past experience and statistical methods, to limit our exposure to large single claims and catastrophes.

PR2

- We worked to improve the processes and tools in place for managing and improving the energy efficiency of our operations, thereby making us more resilient to fluctuations in increasing fuel costs, climatic pressures on the ambient controls of our buildings and disruptions in utility supplies caused by severe weather events
- We have developed our first Group Climate Change Strategy which aims to improve the completeness and accuracy of our emissions data, sets a group target for carbon reductions, and will create initiatives to engage all our stakeholders
- We have made changes to the buildings we own or lease to reduce our carbon emissions. These changes include refitting existing units and building or leasing more environmentally-friendly new ones
- We are working to reduce the water used in our South African properties that we manage through bleed-off and rainwater harvesting, using treated effluent for irrigation and upgrading toilet facilities with low-flow taps We provide back-up generators extensively across our African and emerging market operations to counteract any disruptions in energy provision within these regions, which could potentially be caused by climate change events
- We have appropriate insurance for our properties to cover ourselves for the cost of any climate change related damage
- We have emergency recovery plans (Business Continuity Plans) and back-up data across all businesses. Old Mutual plc, for example, has a disaster recovery site where electronic copies of all documents are stored and which can be accessed remotely with the use of a pass code; Head of Group Financial Crime Prevention and Security has overall responsibility for oversight of business continuity arrangements.

PR3

- In 2011 we developed governance structures to support a more co-ordinated and consistent approach to responsible investment across the Group. We established a Responsible Investment Committee for the Long-Term Savings division to help set the investment criteria appropriate for Old Mutual and to help integrate these new decision making behaviours across the Group
- Our asset diversification policy and in-house Risk Exposure Aggregation System (REAS) ensures that we do not have a concentration of investment in a particular sector or investment type. We also include environmental factors (including climate change) into our investment decisions as part of our ESG assessment of companies.
- Our asset diversification policy and in-house Risk Exposure Aggregation System (REAS) mitigates risk of local 'trauma', including that caused by climate change, by ensuring that we do not have a concentration of investment in a particular sector or investment type

Costs of risk mitigation
PR1, PR2, PR3, The development of remedial action plans to mitigate risks is an integral part of Old Mutual's risk management strategy and as such, the financial costs for climate change specific activities do not represent a material additional cost and are not measured independently from the wider risk management costs.

5.1e

Please describe your risks that are driven by changes in other climate-related developments

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
OR1	Reputation	Climate change is widely recognised as the greatest environmental challenge facing the world today and we recognize that our business needs to go significantly beyond compliance to meet the increasing expectations from stakeholders that we will deal with these challenges. Our reputation improves our ability to attract customers, employees and investment, to motivate employees and suppliers, and to differentiate us from our competitors.	Inability to do business	1-5 years	Indirect (Client)	Unlikely	Medium-high
OR2	Changing consumer behaviour	Poor or instable economic and social situations caused by severe climate change impacts could reduce the ability of potential customers to take advantage of our products.	Reduced demand for goods/services	>10 years	Indirect (Client)	Unlikely	High
OR3	Induced changes in human and cultural environment	We work hard to attract, engage and develop the best people and climate change could seriously impact on the health and availability of our employees. Potential water scarcity, food shortages and threat of disease could lead to migration and loss of health. Whilst disruption to transport links caused by severe weather could have an onward impact on our people	Inability to do business	>10 years	Direct	Unlikely	High

ID	Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
		and their ability to get to work.					

5.1f

Please describe (i) the potential financial implications of the risk before taking action; (ii) the methods you are using to manage this risk; (iii) the costs associated with these actions

Financial implications:
OR1 - Our reputation improves our ability to attract customers, employees and investment, to motivate employees and suppliers, and to differentiate us from our competitors, the potential cost of the damage to Old Mutual reputation is unquantifiable.
OR2 -These risks are currently not quantified at a climate change specific level.
OR3- These risks are currently not quantified at a climate change specific level.
Management of risks:
OR1
The management of our reputation through our social and environmental impacts is a central part of what it means for us to be a responsible business and deliver long-term sustainable success. Maintaining our reputation means not only taking action to mitigate our own climate change impacts but creating new products to meet customer demand and committing to a broader role in helping tackle the global challenges that climate change presents. The following points illustrate some of the key things we do to help build a reputation of being our customers most trusted partner through managing our climate change risks and exploiting the opportunities it creates:

- We have integrated climate change into our business strategy
- We have a Responsible Business Policy that has been rolled out across the Group and a Group Climate Change Strategy with targets to reduce the GHG emissions from our operations
- We talk to our stakeholders. Understanding what matters to them, is always important, including discussing issues around climate change
- We use external guidelines and frameworks - such as the FTSE4Good Index, JSE's Socially Responsible Investment Index and the United National Global Compact - to help inform our approach to governance and risk
- We offer services and products that specifically enable our customers to avoid or offset GHG emissions such as the The Nedbank Green Affinity, Savvy Account and Solar water heater programme.

OR2

- We offer innovative products to suit different clients and different client needs, enabling us to find opportunities even in challenging market conditions, including those caused by climate change. We closely monitor lapse rates and persistency information, adapting our business approach as necessary. Old Mutual is diversified across territories and product lines minimising the impact of any specific sector or territory. As a long-term savings, protection and investment business we are focused on helping people plan ahead and provide for unforeseen expenses and circumstances. As part of this we provide financial education to our customers and wider society to help them with this.

OR3

- Employee well-being programmes are implemented in businesses across the Group. They offer counselling and information services to employees to help them manage periods of stress and illness. These services should help our employees cope with the changes they experience as a result of climate change, increases in illnesses that may arise and the trauma potentially experienced due to extreme weather events
- Where possible and appropriate we also provide employees with the equipment and systems necessary to work remotely. This has obvious business benefits but also provides the capacity to continue to operate remotely through secure web access should extreme or severe weather conditions caused by climate change prevent physical access to our offices for employees

Costs of risk mitigation
OR1, OR2 & OR3-There is no additional cost on managing these risks and do not represent a material cost to the business.

5.1g

Please explain why you do not consider your company to be exposed to risks driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

5.1h

Please explain why you do not consider your company to be exposed to risks driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

5.1i

Please explain why you do not consider your company to be exposed to risks driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

6.1

Have you identified any climate change opportunities (current or future) that have the potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

Opportunities driven by changes in regulation
Opportunities driven by changes in physical climate parameters
Opportunities driven by changes in other climate-related developments

6.1a

Please describe your opportunities that are driven by changes in regulation

ID	Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact
OPR1	General environmental regulations, including planning	Global legislation at international, national and local levels will require business and Old Mutual's current and potential customers to reduce the carbon intensity and carbon costs of their business. New services will be needed to help people meet the demands of new regulations. The increased demand and need for low-carbon energy to mitigate greenhouse gas emissions provides a business opportunity for our project developers and investors through the creation of new investment markets. The HSBC Climate Change Centre of Excellence estimated in 2009 that over USD470 billion of fiscal stimulus has been earmarked by governments to climate change investment themes. Cap and Trade schemes will create the need for offsetting and advisory services that could be provided by our businesses. Nedbank has already created a Carbon Team to explore these possibilities and expects to generate project funding in excess of	New products/business services	Current	Direct	Very likely	Medium

ID	Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact
		$100 million over the next two to five years.					
OPR2	Fuel/energy taxes and regulations	Fuel/energy taxes and regulations - Efficiency gains are available through reducing energy consumption in light of potential increases in regulation surrounding energy consumption and emissions. For example, increased building regulations will lead to more efficient building stock that will directly reduce our operational costs and potentially increase the value of energy efficient building investment portfolios.	Reduced operational costs	Current	Direct	Virtually certain	Low-medium

6.1b

Please describe (i) the potential financial implications of the opportunity; (ii) the methods you are using to manage this opportunity; (iii) the costs associated with these actions

Financial implications of opportunity:
OPR1 – HSBC's Climate Change Centre for Excellence estimates that the global market for low-carbon solutions will triple to over US$2.2 trn by 2020.
OPR2 – The electricity price increases announced in South Africa from 41.31c per kWh in 20010/11 to 65.06c per kWh2012/2013 would lead to an increase in electricity costs for Old Mutual of £10,500,000 but by reducing our electricity consumption by 20% we could save nearly £6,000,000.

Methods to manage:
OPR1 –
New services will be needed to help people protect themselves from the risks of climate change (e.g. crop or building insurance) as well as for those who are actively seeking to make a positive contribution to the challenge of climate change (e.g. through investing in social or environmental focused funds). Below are examples of the range of products and services that are designed to attract eco-conscious customers and capture the opportunities available to Old Mutual through climate change:

- Old Mutual South Africa has a wide range of social, environmental and transformation related funds. In 2011 we had over £2.8 billion funds under management in specifically social, environmental and transformation related investment - including OMIGSA's Futuregrowth Fund and the African Infrastructure Investment Managers Fund.
- At Nedbank we offer an Affinity card which appeals to the eco-conscious customer by offering the opportunity to donate to climate change related projects at no additional cost to the customer. Please see the Nedbank CDP submission for more details

- Nedbank Capital has a dedicated Carbon Finance Team that provides carbon advisory and footprinting services, identification and development of Clean Development Mechanism projects and carbon trading
- Nedbank Wealth Become Programme – Nedbank Wealth offer a world-class life insurance offering, complemented by a holistic health and wellbeing programme called 'Become'. In addition to personal wellness, the programme provides members with access to information on how they can contribute to the wellbeing of the planet
- Greenbacks 'green stream' – following demand from clients, the Greenbacks loyalty programme was enhanced through the addition of a 'green stream', allowing members of the programme to redeem their loyalty points for goods that are environmentally friendly. To date more that 3% of the total number of client redemptions have been for 'green' products.
- Through Mutual & Federal, which also offers various business specific schemes such as crop insurance products for farmers, we also make use of brokers who belong to the Agri Guild to give advice on risk management.
- As a long-term savings, protection and investment business we are focused on helping people plan ahead and provide for unforeseen expenses and circumstances, including those that arise due to the physical impacts of climate change

OPR2-
As energy taxes increase the energy costs of running our property portfolios and offices they also provide financial incentive to reduce our energy consumption, becoming more energy efficient and make potential financial and energy savings. We have been working to improve the processes and tools in place for managing and improving the energy efficiency of our operations, enabling us to capitalise on this opportunity:

- We have a Group Climate Change Strategy which aims to improve the completeness and accuracy of our emissions data, sets a Group target for carbon reductions, and will create initiatives to engage all our stakeholders
- We have made changes to the buildings we own or lease to reduce our carbon emissions. These changes include refitting existing units and building or leasing more environmentally-friendly new ones.
- At a business level, Old Mutual Property has a green building strategy and which provides us with a structured approach to improving the environmental sustainability of the buildings in our existing portfolio and the ones we are constructing.

Costs of action:
Investment figures for the development of these opportunities are not currently available. We will look at the possibility of capturing this information for future submissions.

6.1c

Please describe the opportunities that are driven by changes in physical climate parameters

ID	Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
PO1	Other physical climate opportunities	The increase in extreme weather conditions caused by climate change is likely to lead to significant increases in the scale and frequency of significant financial costs to customers as a result of damage to infrastructure, disruption of utility services (for example access to water), damage to property and crops, disruption of supply chains and distribution of natural resources. Insurance products can offer a method of spreading the risks associated with these impacts and as the impacts of climate change grow, so too is the likely demand for insurance products. The businesses able to maximise these opportunities are Old Mutual Specialised Finance, Old Mutual Life Assurance company of South Africa Limited, Nedgroup Life Assurance Company Limited and Old Mutual Financial Life Insurance company (OMFLIC) which provide long-term insurance and Nedgroup Insurance Company Limited and Mutual & Federal, which provide short-term insurance.	Increased demand for existing products/services	1-5 years	Indirect (Client)	Virtually certain	Medium

6.1d

Please describe (i) the potential financial implications of the opportunity; (ii) the methods you are using to manage this opportunity; (iii) the costs associated with these actions

Financial implications of opportunity
PO1 - The financial costs of these opportunities are not currently measured by Old Mutual.
Methods to manage:
PO1 –
As a long-term savings, protection and investment business we are focused on helping people plan ahead and provide for unforeseen expenses and circumstances, including those that arise due to the physical impacts of climate change, as demonstrated by the list of customer offerings listed below:

- Investments and savings products that can help grow our customers' money or draw an income – depending on their needs.
- Risk cover provides financial security for customers in the event of disease, disablement, death or retrenchment
- Medical cover ensuring that our customers have access to the best medical care available
- Life cover protects customers and their families from financial loss as a result of death and disability

- Funeral cover to remove the burden of administration and expense in the event of a death in the family
- Through Mutual & Federal, which also offers various business specific schemes such as crop insurance products for farmers, we also make use of brokers who belong to the Agri Guild to give advice on risk management.

Costs of action:
PO1 -The costs associated with these actions are not currently measured at a climate change specific level but do not represent a material additional cost to the business.

6.1e

Please describe the opportunities that are driven by changes in other climate-related developments

ID	Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact
OO1	Reputation	Our reputation improves our ability to attract customers, employees and investment, to motivate employees and suppliers, and to differentiate us from our competitors. Climate change is widely recognised as the greatest environmental challenge facing the world today. We recognise the opportunities available to the business in going significantly beyond compliance to meet our stakeholder expectations in dealing with climate change.	Increased stock price (market valuation)	1-5 years	Direct	Very likely	Medium

6.1f

Please describe (i) the potential financial implications of the opportunity; (ii) the methods you are using to manage this opportunity; (iii) the costs associated with these actions

Financial implications of opportunity
OO1 - The financial costs of these opportunities are not currently measured by Old Mutual.
Methods to manage:
OO1 –
We have taken the following actions that demonstrate to different stakeholder groups the ways in which we are tackling climate change and acting as a responsible business and maximise the reputational opportunities that climate change represent:

- Employee engagement: As well as promoting behaviour change at work to help us reach our own environmental targets, we have also run programmes throughout the Group to help employees take action at home. For example, Nedbank promotes environmental awareness is through an annual Deep Green Day
- Supplier engagement: Businesses are signed up to our new Responsible Business Policy which includes commitments to factors into procurement decisions, wherever practical, the environmental and social impacts of our suppliers and to work with suppliers to create awareness and progress understanding of their social and environmental impacts. Nedbank have a nine-point procurement scorecard as a requirement for prospective suppliers. Skandia UK now include a requirement in all Requests for Proposals that suppliers have a corporate responsibility policy that matches, or exceeds, the Group policy.
- Wider stakeholder engagement: We have made a number of commitments and undertaken activities across the Group which demonstrates our commitment to deal with climate change and engage with policy makers. For example:
    - Nedbank sponsored the World Climate Summit and Climate Action Event, many group executives spoke, sharing the stage with President Jacob Zuma and other dignitaries.
    - The Nedbank Group Kingsmead building played host to a number of key events, addressing critical issues around energy, water and food security.
    - Nedbank Group's partnership with Cambridge Programme for Sustainable Leadership resulted in the popular COPpuccino sessions, which brought together thought leaders and analysts to give a business perspective on each day's proceedings at COP17
    - At a Group level we became a signatory of The 2°C Challenge Communiqué – an international coalition of business leaders calling on governments to take action at a national level to ensure a successful transition to a climate-resilient economy
    - Old Mutual Investment Group, South Africa (OMIGSA) was actively involved in the drafting of the Code of Responsible Investing in South Africa (CRISA) throughout 2011. Jon Duncan, ESG Analyst at Old Mutual, was an active member of the Drafting Committee

Costs of action:
<u>OO1</u> - The costs associated with these actions are not currently measured at a climate change specific level but do not represent a material additional cost to the business.

6.1g

Please explain why you do not consider your company to be exposed to opportunities driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

6.1h

Please explain why you do not consider your company to be exposed to opportunities driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

6.1i

Please explain why you do not consider your company to be exposed to opportunities driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

Module: GHG Emissions Accounting, Energy and Fuel Use, and Trading [Investor]

Page: 7. Emissions Methodology

7.1

Please provide your base year and base year emissions (Scopes 1 and 2)

Base year	Scope 1 Base year emissions (metric tonnes CO2e)	Scope 2 Base year emissions (metric tonnes CO2e)
Fri 01 Jan 2010 - Fri 31 Dec 2010	13795	661484

7.2

Please give the name of the standard, protocol or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions

Please select the published methodologies that you use
The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

7.2a

If you have selected "Other", please provide details below

7.3

Please give the source for the global warming potentials you have used

Gas	Reference
CO_2	Other: 2010 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
CH_4	Other: 2010 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting

7.4

Please give the emissions factors you have applied and their origin; alternatively, please attach an Excel spreadsheet with this data

Fuel/Material/Energy	Emission Factor	Unit	Reference
Diesel/Gas oil	2.67	kg CO_2 per litre	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Natural gas	2.02	Other: kg CO23/m3	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Austria	0.22	Other: kg CO_2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Bermuda	0.59	Other: kg CO_2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Botswana	0.72	Other: kg CO_2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting

Fuel/Material/Energy	Emission Factor	Unit	Reference
Other: Electricity China	0.83	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Colombia	0.23	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Denmark	0.36	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Dubai		Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Finland	0.23	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity France	0.09	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Germany	0.46	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Hong Kong	0.85	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity India	1.27	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Ireland	0.58	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Italy	0.43	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Kenya	0.72	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Malawi	0.72	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Mexico	0.59	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Namibia	0.72	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Norway	0.01	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Poland	0.71	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Singapore	0.61	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting

Fuel/Material/Energy	Emission Factor	Unit	Reference
Other: Electricity South Africa	0.94	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Sweden	0.05	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity Switzerland	0.03	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity United Kingdom	0.52	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity United States of America	0.59	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting
Other: Electricity - Zimbabwe	0.72	Other: kg CO2e per kWh	2011 Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting

Page: 8. Emissions Data - (1 Jan 2011 - 31 Dec 2011)

8.1

Please select the boundary you are using for your Scope 1 and 2 greenhouse gas inventory

Equity share

8.2a

Please provide your gross global Scope 1 emissions figure in metric tonnes CO2e

12068.38

8.2b

Please provide your gross global Scope 1 emissions figures in metric tonnes CO2e - Part 1 breakdown

Boundary	Gross global Scope 1 emissions (metric tonnes CO2e)	Comment

8.2c

Please provide your gross global Scope 1 emissions figures in metric tonnes CO2e - Part 1 Total

Gross global Scope 1 emissions (metric tonnes CO2e) – Part 1 Total	Comment

8.2d

Please provide your gross global Scope 1 emissions figures in metric tonnes CO2e - Part 2

Boundary	Gross global Scope 1 emissions (metric tonnes CO2e)	Comment

8.3a

Please provide your gross global Scope 2 emissions figure in metric tonnes CO2e

555726.4

8.3b

Please provide your gross global Scope 2 emissions figures in metric tonnes CO2e - Part 1 breakdown

Boundary	Gross global Scope 2 emissions (metric tonnes CO2e)	Comment

8.3c

Please provide your gross global Scope 2 emissions figures in metric tonnes CO2e - Part 1 Total

Gross global Scope 2 emissions (metric tonnes CO2e) - Total Part 1	Comment

8.3d

Please provide your gross global Scope 2 emissions figures in metric tonnes CO2e - Part 2

Boundary	Gross global Scope 2 emissions (metric tonnes CO2e) - Other operationally controlled entities, activities or facilities	Comment

8.4

Are there are any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions which are not included in your disclosure?

8.4a

Please complete the table

Reporting Entity	Source	Scope	Explain why the source is excluded

8.4

Are there are any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions which are not included in your disclosure?

Yes

8.4a

Please complete the table

Source	Scope	Explain why the source is excluded
South Africa and Kenya Branches	Scope 1 and 2	These premises are rented making data collection difficult. We are working to start data collection from these sites and generate estimates where accurate data is not an option. Information has not been collected due to local reporting and data collection barriers, primarily around collecting energy consumption data from rented premises where the landlord does not pass on energy consumption data to Old Mutual
Property portfolios	Scope 1 and 2	Data has not been collected from a number of Old Mutual's small property portfolios such as the India Triangle Fund and Malawi property portfolios due to undeveloped nature of data collection systems in these parts of the business. These portfolios are not material to Old Mutual's total emissions.
Selected Nedbank electronic banking services like ATM, SST and POS	Scope 2	Reliable data for electricity consumption for electronic banking service devices: Automated Teller Machines (ATM), Self Service Terminals (SST) and Point of Sale (POS) devices is not currently available.
Bancassurance and Wealth Financial Advisors	Scope 2	Electricity consumed by approximately 60 (0.2% of Nedbank headcount) Financial Advisors that work from home offices is not currently reported. Reliable data cannot be obtained. Emissions from this source are not material.
Pick-n-Pay in store Nedbank outlets	Scope 2	Separate electricity meters are not installed for approximately 100 small Nedbank service outlets at in-store Nedbank "kiosks". These outlets consist of two to three staff with computer and printing facilities. A proxy calculation of associated emissions is being developed.

8.5

Please estimate the level of uncertainty of the total gross global Scope 1 and Scope 2 figures that you have supplied and specify the sources of uncertainty in your data gathering, handling, and calculations

Scope 1 emissions: Uncertainty range	Scope 1 emissions: Main sources of uncertainty	Scope 1 emissions: Please expand on the uncertainty in your data	Scope 2 emissions: Uncertainty range	Scope 2 emissions: Main sources of uncertainty	Scope 2 emissions: Please expand on the uncertainty in your data
More than 2% but less than or equal to 5%	Data Gaps Data Management	Some parts of the business experience problems with reporting emissions from air conditioning units and as a result were not reported or included in emissions calculations. We are working to improve this gap in data collection with increased training and monitoring of data reporting.	More than 2% but less than or equal to 5%	Data Gaps Assumptions	Some parts of the business had problems gaining energy consumption data from landlords where Old Mutual is a tenant and estimates were made. For example, for USAM affiliate head offices (in 2010 and 2011) and Mutual & Federal branches.

8.6

Please indicate the verification/assurance status that applies to your Scope 1 emissions

Verification or assurance complete

8.6a

Please indicate the proportion of your Scope 1 emissions that are verified/assured

More than 0% but less than or equal to 20%

8.6b

Please provide further details of the verification/assurance undertaken, and attach the relevant statements

Level of verification or assurance	Relevant verification standard	Relevant statement attached
Limited assurance	AA1000 Assurance Standard	Nedbank's emissions were verified by KPMG and Deloitte & Touche. Old Mutual Group only report 55% of Nedbank emissions through the equity share reporting methodology and this equates to 3% of Group scope 1 emissions that were verified.

8.7

Please indicate the verification/assurance status that applies to your Scope 2 emissions

Verification or assurance complete

8.7a

Please indicate the proportion of your Scope 2 emissions that are verified/assured

More than 0% but less than or equal to 20%

8.7b

Please provide further details of the verification/assurance undertaken, and attach the relevant statements

Level of verification or assurance	Relevant verification standard	Relevant statement attached

Level of verification or assurance	Relevant verification standard	Relevant statement attached
Limited assurance	AA1000 Assurance Standard	Nedbank's emissions were verified by KPMG and Deloitte & Touche. Old Mutual Group only report 55% of Nedbank emissions through the equity share reporting methodology and this equates to 7% of Group scope 2 emissions that were verified.

8.8

Are carbon dioxide emissions from the combustion of biologically sequestered carbon (i.e. carbon dioxide emissions from burning biomass/biofuels) relevant to your company?

No

8.8a

Please provide the emissions in metric tonnes CO2e

Attachments

https://www.cdproject.net/Sites/2012/07/13807/Investor CDP 2012/Shared Documents/Attachments/InvestorCDP2012/8.EmissionsData(1Jan2011-31Dec2011)/Nedbank Assurance Statement.pdf

Page: 9. Scope 1 Emissions Breakdown - (1 Jan 2011 - 31 Dec 2011)

9.1

Do you have Scope 1 emissions sources in more than one country or region (if covered by emissions regulation at a regional level)?

Yes

9.1a

Please complete the table below

Country	Scope 1 metric tonnes CO2e
Austria	66.74
Bermuda	0
Botswana	0
China	3.87
Colombia	111.73
Denmark	0
Dubai	0
Finland	0
France	0
Germany	531.26
Hong Kong	0
India	16.61
Ireland	0
Italy	0
Kenya	21.17
Malawi	13.92
Mexico	0.67
Namibia	45
Norway	0
Poland	222.81
Singapore	0
South Africa	10085
Sweden	0
Switzerland	5.17
United Kingdom	873.72
United States of America	0
Zimbabwe	55.72
Isle of Man	14.99
Swaziland	0

9.2

Please indicate which other Scope 1 emissions breakdowns you are able to provide (tick all that apply)

By business division
By activity

9.2a

Please break down your total gross global Scope 1 emissions by business division

Business Division	Scope 1 metric tonnes CO2e
Asset Management US	0.91
Bermuda Business	0
Long Term Savings	11648
Mutual & Federal	0
Nedbank	418.64

9.2b

Please break down your total gross global Scope 1 emissions by facility

Facility	Scope 1 metric tonnes CO2e

9.2c

Please break down your total gross global Scope 1 emissions by GHG type

GHG type	Scope 1 metric tonnes CO2e

9.2d

Please break down your total gross global Scope 1 emissions by activity

Activity	Scope 1 metric tonnes CO2e
Employee locations	2402
Property Portfolio	9666.66

Page: 10. Scope 2 Emissions Breakdown - (1 Jan 2011 - 31 Dec 2011)

10.1

Do you have Scope 2 emissions sources in more than one country or region (if covered by emissions regulation at a regional level)?

Yes

10.1a

Please complete the table below

Country	Scope 2 metric tonnes CO2e
Austria	5.12
Bermuda	81.66
Botswana	10.21
China	144.84
Colombia	201.23

Country	Scope 2 metric tonnes CO2e
Denmark	137.52
Dubai	0
Finland	0.01
France	23.42
Germany	395.63
Hong Kong	66.63
India	1480.16
Ireland	19.99
Italy	308.96
Kenya	40.67
Malawi	0
Mexico	214.37
Namibia	1412.47
Norway	7.15
Poland	205.86
Singapore	0
South Africa	527731
Sweden	185.38
Switzerland	43.29
United Kingdom	8819.24
United States of America	3772.11
Zimbabwe	9362.98
Isle of Man	1013.17
Swaziland	43.29

10.2

Please indicate which other Scope 2 emissions breakdowns you are able to provide (tick all that apply)

By business division
By activity

10.2a

Please break down your total gross global Scope 2 emissions by business division

Business division	Scope 2 metric tonnes CO2e
Asset Management US	3920.42
Bermuda Business	81.66
Long Term Savings	498966.56
Mutual & Federal	5266.87
Nedbank	47490.49

10.2b

Please break down your total gross global Scope 2 emissions by facility

Facility	Scope 2 metric tonnes CO2e

10.2c

Please break down your total gross global Scope 2 emissions by activity

Activity	Scope 2 metric tonnes CO2e
Employee locations	108330
Property Portfolio	447396

Page: 11. Emissions Scope 2 Contractual

11.1

Do you consider that the grid average factors used to report Scope 2 emissions in Question 8.3 reflect the contractual arrangements you have with electricity suppliers?

Yes

11.1a

You may report a total contractual Scope 2 figure in response to this question. Please provide your total global contractual Scope 2 GHG emissions figure in metric tonnes CO2e

11.1b

Explain the basis of the alternative figure (see guidance)

11.2

Has your organization retired any certificates, e.g. Renewable Energy Certificates, associated with zero or low carbon electricity within the reporting year or has this been done on your behalf?

No

11.2a

Please provide details including the number and type of certificates

Type of certificate	Number of certificates	Comments

Page: 12. Energy

12.1

What percentage of your total operational spend in the reporting year was on energy?

12.2

Please state how much fuel, electricity, heat, steam, and cooling in MWh your organization has consumed during the reporting year

Energy type	MWh
Fuel	9145.25
Electricity	626240.54
Heat	722.20
Steam	
Cooling	

12.3

Please complete the table by breaking down the total "Fuel" figure entered above by fuel type

Fuels	MWh
Liquefied petroleum gas (LPG)	3.85
Diesel/Gas oil	4063.82
Motor gasoline	1574.06
Natural gas	3503.52

Page: 13. Emissions Performance

13.1

How do your absolute emissions (Scope 1 and 2 combined) for the reporting year compare to the previous year?

Decreased

13.1a

Please complete the table

Reason	Emissions value (percentage)	Direction of change	Comment
Emissions reduction activities	16	Decrease	Most significant emissions reduction came from scope 2, specifically the property portfolio in South Africa which represents 85% of total scope 1 and 2 emissions.

13.2

Please describe your gross combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per unit currency total revenue

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for Change
158	metric tonnes CO2e	unit total revenue	3.58	Increase	Financial services companies generally don’t have a straightforward turnover figure. Therefore, we use Gross Earned Premiums and report in millions of pounds sterling against scope 1 and scope 2 metric tonnes of CO2e. Old Mutual believes that the emission intensity targets it has set per employee and per metre squared are more relevant ways to measure energy efficiency and show good progress against targets.

13.3

Please describe your gross combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per full time equivalent (FTE) employee

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for Change
2.33	metric tonnes CO2e	FTE Employee	6	Decrease	In our employee occupied properties, we decreased our emissions by 6% to 2.33 tonnes of CO2e per employee (2010: 2.47 tonnes CO2e/full time employee) through a wide range of structural and behavioural initiatives.

13.4

Please provide an additional intensity (normalized) metric that is appropriate to your business operations

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for Change
0.21	metric tonnes CO2e	square meter	10	Decrease	In our investment property portfolio, we decreased our emissions by 10% to 0.21 tonnes of CO2e per square metre (2010: 0.23 tonnes CO2e/m2). This success is largely due to continued efforts made by the Old Mutual Property team in South Africa to improve the way properties are managed and developed. Meter squared decreased by 3.64% in 2011 from 2,528,857m2 (property portfolio only) to 2,436,788 m2 (property portfolio only).

Page: 14. Emissions Trading

14.1

Do you participate in any emission trading schemes?

Yes

14.1a

Please complete the following table for each of the emission trading schemes in which you participate

Scheme name	Period for which data is supplied	Allowances allocated	Allowances purchased	Verified emissions in metric tonnes CO2e	Details of ownership
Other: Nedbank Self Imposed Carbon Neutral Status	Sat 01 Jan 2011 - Wed 21 Dec 2011	0	240000	217957.13	Other: All facilities occupied by Nedbank - own, managed, leased etc.

14.1b

What is your strategy for complying with the schemes in which you participate or anticipate participating?

Nedbank monitors, measures and reports on its carbon footprint annually. It is always the aim to reduce the footprint as far as possible before offsetting the residual footprint. Nedbank's self-imposed carbon neutral status leads to internalising the cost of greenhouse gas pollution. By implication the management of the cost then results in lower Nedbank's carbon footprint.

14.2

Has your company originated any project-based carbon credits or purchased any within the reporting period?

Yes

14.2a

Please complete the following table

Credit origination or credit purchase	Project type	Project identification	Verified to which standard	Number of credits (metric tonnes of CO2e)	Number of credits (metric tonnes CO2e): Risk adjusted volume	Credits retired	Purpose e.g. compliance
Credit Purchase	Forests	Project name: The Kasigau Corridor REDD Project - Phase I Project site: Rukinga Sanctuary, Kenya. Description: Nedbank is delighted to continue its association with this project in 2011. In 2011 it became the world's first Reducing Emissions from Deforestation and Forest Degradation (REDD) project to issue carbon credits. The project is successfully preventing the deforestation of Kenya's Kasingau corridor while delivering significant economic, social and cultural benefits to local communities.	VCS	150000	150000	No	Voluntary Offsetting

Page: 2012-Investor-Scope 3 Emissions

15.1

Please provide data on sources of Scope 3 emissions that are relevant to your organization

Sources of Scope 3 emissions	metric tonnes CO2e	Methodology	If you cannot provide a figure for emissions, please describe them
Business travel	14023	Data is provided from our external travel agency who provide records of air travel for our main business units. The air flights are categorised as long, medium and short haul (short = <1,000 km, medium = 1,001 - 4,000km, long = >4,000km). Conversion factors were taken from the 2010 Guidelines to Defra/DECC's GHG conversion Factors for Company Reporting, Annex 6 - Passenger Transport conversion tables. Nedbank emissions were calculated at the individual business unit level. Nedbank business travel includes rental cars used, commercial airlines and employee	

Sources of Scope 3 emissions	metric tonnes CO2e	Methodology	If you cannot provide a figure for emissions, please describe them
		owned cars used periodically for business purposes. Increased level of detail pertaining to Nedbank: Nedbank uses various data sources to collate the data. The data sources include fuel purchase records, data received from the suppliers of rental vehicles and commercial airline. Examples/case studies and other quantitative information: Emissions from business travel have increased by 43% predominantly due to an increase in flights due to expanding business opportunities and business footprint. Contrary to the increased amount of flights, car rental use decreased. No information is available at this time to identify a business reason for this shift.	
Employee commuting	22580	A staff survey is done annually for all Nedbank employees to derive modes of transport and commuting distances. Commuting emissions for employees are estimated by multiplying the average emissions per survey respondent by the FTE count. The 2011 South African staff community survey again received valid responses from approximately 60% of staff. Emissions from employee commuting rose by approximately 16% in Nedbank to 41054 tCO2e as a consequence of a small rise in the average emissions per FTE and an increase in the staff count of 2%.	
Purchased goods & services	1946	Supplier emissions refer to emissions associated with the paper consumption of Nedbank in 2011. The level of monitoring and measuring of paper consumption is increasing. The result is that better quality data is progressively becoming available to Nedbank regarding internal consumption. In 2011 Nedbank overcame many of the previously mentioned constraints to reduce paper consumption. The result is that paper use decreased by 15% year on year.	

15.2

Please indicate the verification/assurance status that applies to your Scope 3 emissions

Verification or assurance complete

15.2a

Please indicate the proportion of your Scope 3 emissions that are verified/assured

More than 40% but less than or equal to 60%

15.2b

Please provide further details of the verification/assurance undertaken, and attach the relevant statements

Level of verification or assurance	Relevant verification standard	Relevant statement attached
Limited assurance	AA1000 Assurance Standard	Nedbank's emissions were verified by KPMG and Deloitte & Touche. Old Mutual Group only report 55% of Nedbank emissions through the equity share reporting methodology and this equates to 57% of Group scope 3 emissions that were verified. Nedbank's scope 3 emissions data collection is more advanced than at the Group level.

15.3

Are you able to compare your Scope 3 emissions for the reporting year with those for the previous year for any sources?

Yes

15.3a

Please complete the table

Sources of Scope 3 emissions	Reason for change	Emissions value (percentage)	Direction of change	Comment
Business travel	Other: Improved data collection	11	Increase	We have improved our data collection and reporting for scope 3 in 2011 with more parts of the business reporting their business travel than ever before. This means that despite activities to reduce business travel, for example through increase teleconferencing, there has been an increase in the emissions from business travel reported.
Employee commuting	Other: Increase in employee commuting	17	Increase	Approximately 25% of Nedbank Group's total GHG emissions arise from reported Scope 3 activities, 19% being from staff commuting, 4.5% from staff business travel, 1.6% from emissions arising from third-party manufacture of office paper and the remainder from product distribution. Business Travel: Business travel increased predominantly due to a 43% year on year increase in flights – based on kilometres flown. This is attributed to the bank expanding its footprint into Africa and other business opportunities. Staff commuting: Emissions from staff commuting rose by 116.89% as a consequence of a small rise in full time employee (FTE) count and staff having a marginal increase in emissions per commuting journey (kilometres driven to the office increased and higher polluting vehicles were used.) Commuting emissions for all staff are estimated by multiplying the average emissions per survey respondent by the FTE count. The 2011 South African staff commuting survey again received valid responses from approximately 60% of staff members.

Module: Sign Off

Page: Sign Off

Please enter the name of the individual that has signed off (approved) the response and their job title

Don Schneider
Group Human Resources Director and Chair of the Responsible Business Committee